

RCRA Permit Renewal Application Response to Notice of Deficiencies

July 31, 2007

**Submitted by:
Lemont Refinery
Lemont, Illinois**



6-10-07

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CITGO Petroleum Corporation



135th Street & New Avenue
Lemont, IL 60439-3659

July 31, 2007

Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land - #33
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P. O. Box 19276
Springfield, IL 62794-9276

Dear Mr. Nightingale:

Attached is the original transmittal letter for the refinery's response to the Agency's June 21, 2007 RCRA Permit Renewal Application Notice of Deficiency (NOD). The NOD response was submitted under separate cover by our consultant TRC with a copy of this letter.

If you have any questions concerning this submittal please contract me at 630-257-4450 or Kevin Moss at 630-257-4450.

Sincerely

C. W. Harmon, Manager
Health, Safety, Security & Environmental

KJM:PLM

By FedEx Airbill – 8558 9047 0933

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PERMIT SECTION

**CITGO Petroleum Corporation**

135th Street & New Avenue
Lemont, IL 60439-3659

July 31, 2007

Stephen F. Nightingale, P.E.
Manager, Permit Section, Bureau of Land
Illinois Environmental Protection Agency
Bureau of Land - #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

**1978030004 – Will County
CITGO, Lemont Refinery
ILD 041 550 567**

Log. No. B-162R

**Response to Notice of Deficiency for the RCRA Part B Renewal Permit
Application**

Dear Mr. Nightingale:

Enclosed are an original and three copies of replacement pages to the Resource Conservation and Recovery Act (RCRA) Part B Permit Renewal Application (Renewal Application) submitted on April 23, 2007. These revisions serve to address the notice of deficiencies (NODs) identified by the Illinois Environmental Protection Agency (Illinois EPA) during the initial completeness review of the Renewal Application. A cross-reference table indicating the location within the Renewal Application of the modification corresponding to the NOD is provided as Attachment 1 to this letter. Replacement pages to the Renewal Application are provided in Attachment 2.

Additionally, the NOD suggested a meeting to discuss the CAMU status prior to this response. In discussions with Rob Watson of your staff it was decided to meet shortly after this response is submitted (August 2007) as time constraints would limit a thorough review.

A discussion of the Refinery's response to the NODs is provided below:

1. IEPA Form LPC-PA23: The name and address of the owner is not provided in Section II of this form. This information is required for all RCRA permit applications.

The name and address of the owner have been provided in Section II of the Illinois EPA Form LPC-PA23 provided with this submittal.

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2. IEPA Form LPC-PA23: The owner's name and signature are not provided in Section IV of this form. This information is required for all RCRA permit applications.

The name and signature of the owner have been provided in Section IV of the Illinois EPA Form LPC-PA23 provided with this submittal. The Lemont Refinery's Plant Manager has signatory authority as both the Owner and Operator of the Refinery. A letter from the Assistant Secretary of PDV Midwest Refining LLC, documenting the signatory authority of the refinery's Plant Manager as the Owner is provided in Appendix A.2.4.

3. IEPA Certificate of Authenticity Form: The owner's name and signature are not provided on this form.

The name and signature of the owner have been provided on the Illinois EPA Certificate of Authenticity Form provided with this submittal.

4. The Part A indicates that the owner and operator are different companies. However, Sections A.1.1 and A.2.2 of the application state that the Vice President & General Manager of the refinery (Bob Kent) has signatory authority as both the owner and operator. Written documentation of this authority needs to be included as part of the application.

A letter from the Assistant Secretary of PDV Midwest Refining LLC, documenting the signatory authority of the refinery's Plant Manager as the Owner is provided in Appendix A.2.4.

5. IEPA Form LPC-PA23: The name, signature, and seal of a Professional Engineer are not provided on this form. Most of the information in the application is technical in nature. Therefore, the name, signature, and seal of a Professional Engineer are required on the LPC-PA23 form.

The information contained within the Renewal Application is informational and factual and does not require engineering design or judgment. Therefore, no PE seal is currently provided. As we proceed with closure designs or similar efforts a PE seal will accompany those submittals.

The Illinois EPA NOD did request that the Refinery incorporate the Corrective Action Management Unit (CAMU) request into the Renewal Application. A copy of the permit modification request for the designation of a CAMU at the LTA submitted in December 1997 has been added to the Renewal Application. This document contains engineering designs and judgments and is therefore sealed by a P.E. in the State of Illinois.

6. Sections A.4.1.4, and A.4.2.2: These sections of the decision guide require the permittee to provide documentation that they have complied with the applicable public involvement requirements of RCRA. To date, this documentation has not been received by the Illinois EPA. Documentation of all notices required by Section A.4 of the decision guide must be provided with the response to these completeness review comments. The documentation must meet the requirements specified in the RCRA decision guide.

The required documentation was submitted to the Illinois EPA in May 2007. (letter dated May 23, 2007). The Refinery understands that the Agency has received this documentation subsequent to issuing the letter containing the NODs. As such, no action is required on this issue. The Renewal Application was updated to indicate that this information has been provided to the Agency.

7. Section B.2.1.2: An index or other map 'key' that shows the portions of the facility covered by each of the Figures B-2 thru B-6 needs to be provided.

The Renewal Application has been updated to include a map key as Figure B-8.

8. Section B.2.1.2: All information on Figures B-2 thru B-6 needs to be re-evaluated for accuracy.

Figures B-2 through B-6 have been reviewed and updated as necessary. Figures B-9 and B-10 have been added in order to provide additional information.

The following basic map requirements need to be corrected:

a. The contour lines need to include elevations

Elevations have been added to the contour lines.

b. A number of contour lines simply stop

The contour lines included on the original Figures B-2 through B-6 are those shown on the source United States Geographic Survey (USGS) 7.5 Minute Series Topographic Map for Romeoville, Illinois (1993). This data set is limited in that some contour lines are shown to stop at berms, dikes, etc. To correct this issue, the contour lines on Figures B-2 through B-6 have been changed to contour lines generated from a previous Refinery survey. Since the Refinery-survey contour lines do not cover the entire area 1,000 feet outside of the property line, the USGS contour lines are provided in Figure B-9. These two sets provide the best data currently available regarding topography at and surrounding the property.

c. Some contour lines intersect

The contour lines included on Figures B-2 through B-6 are those shown on the source United States Geographic Survey (USGS) 7.5 Minute Series Topographic Map for Romeoville, Illinois (1993). The contour lines intersect on the source USGS topographic map and have therefore not been altered.

d. The Des Plaines River is not labeled

The Des Plaines River has been labeled on Figures B-2 through B-6, as applicable.

e. An intermittent stream is located in the Des Plaines River

The intermittent stream in the Des Plaines River was taken from the National Hydrological Data Set. This intermittent stream has been removed from Figures B-2 through B-6, as applicable.

f. The property lines intersect the Chicago Ship and Sanitary Canal, and stop

The Refinery property lines have been corrected on Figures B-2 through B-6, as applicable, to show that the Refinery property does not extend into the Chicago Ship and Sanitary Canal.

g. The four individual land treatment areas need to be identified on Figure B-5

Figure B-5 has been modified to identify the four land treatment areas.

h. Access control needs to be identified on the figures.

Access controls are identified on Figures B-2 through B-7 by blue dots. An additional figure, Figure B-10, has been added to provide additional information regarding the various types of access controls.

9. Section B.3.2, Floodplain Standard: The facility property line and location of the LTAs need to be identified and labeled on the FIRM map provided as Figure B-7.

The facility property line and location of the LTAs have been added to Figure B-7.

10. Section E.2: Interim Status Groundwater Monitoring Data was not complete. Although the facility provided by reference the location of the summary of the groundwater monitoring data obtained during interim status, the facility must provide a general discussion concerning interim status groundwater activities.

A summary of the Interim Status Groundwater Monitoring Data has been added to the Renewal Application in Section E-2.

11. Section E.4: Topographic Map Requirement was not complete. The locations of all groundwater monitoring wells and the point of compliance must be depicted. All requirements of 35 Ill. Adm. Code 703.183(s) and 703.785(c) must be met.

The locations of the groundwater monitoring wells and the point of compliance have been added to Figure B-5.

12. Section E.6.1: Constituents to be Monitored was not complete. The renewal application only provided a list of indicator parameters. The facility must provide a list of indicator parameters, waste constituents or reaction products to be used in providing a reliable indication of the presence of hazardous constituents in groundwater in accordance with 35 Ill. Adm. Code 724.198(a) and 703.185(1)(1).

A thorough review of the historic sampling data is nearly complete but extra time is needed to properly QA this submittal. Per previous discussions with Paula Stine it was agreed that if additional time was needed a new due date be provided in this NOD response. We expect to have this specific response to the Agency by August 10, 2007.

13. Section F.1.3, Barrier and Controlled Entry: Figures B-2 thru B-6 need to show the barrier system (fence) surrounding the active portion of the facility and the gates used for access control.

The Refinery fence system has been added to Figures B-2 through B-6. Access Control Points are shown as blue dots in Figures B-2 through B-6. Figure B-10 has been added to present more detailed descriptions of these access points.

14. The unsaturated zone monitoring (UZM) program in the original permit required soil cores to be collected from the LTA and analyzed for the parameters specified in the permit. The application to renew the RCRA permit needs to include a report of the analytical results from all soil cores collected from the land treatment area (LTA) to date. The report needs to include the following:

a. Copies of the actual analytical reports,

Copies of the analytical reports have been provided to the Illinois EPA under separate cover.

b. A map (or maps) showing the locations of all sample points,

Maps showing the location of all sample points are now provided as Figures I-2 and I-3.

c. A discussion of the analytical results,

A discussion of each set of analytical results is included in the UZM Monitoring Reports submitted to the Illinois EPA under separate cover.

d. A discussion of how/if any samples that showed a statistically significant increase (SSI) was resolved, and

A discussion of any samples that showed a statistically significant increase (SSI) is included in the UZM Monitoring Reports submitted to the Illinois EPA under separate cover.

e. A table summarizing the results of the UZM program that includes (at minimum) all sample locations, dates, and analytical test results. Any sample results that constitute a SSI should be highlighted on the table.

A table summarizing the results of the UZM program is now provided as Table I-8. This

table identifies sample locations, dates, analytical test results, and SSIs.

15. The financial assurance documents provided in Appendix I.6 are dated 2005. The most recent financial assurance documents need to be provided with the permit application.

The most recent financial assurance documents (from 2007) are provided in Appendix I.6. The Refinery claims these documents as exempt from public disclosure under 2 Illinois Administrative Code (IAC) 1828.202.

In addition, per Illinois EPA request, the permit modification request for the designation of a CAMU at the LTA, submitted in December 1997, has been added to the Renewal Application as Appendix I.1.

The copies of the Renewal Application maintained for public review at the Lemont Public Library and the Lemont Village Hall will be updated by the Refinery with the attached replacement pages.

If there are questions or additional information required, please contact me at (630) 257-4450 or Kevin Moss at (630) 257-4452.

Sincerely,



C. W. Harmon, Manager
Health, Safety, Security & Environmental

Attachments

cc: Kevin Moss, Lemont Refinery
Mark Robbins, TRC Environmental Corporation
Refinery RCRA file

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CITGO Petroleum Corporation

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Lemont, IL 60439-3659

July 31, 2007

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A discussion of the Refinery's response to the NODs is provided below:

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10. Section E.2: Interim Status Groundwater Monitoring Data was not complete. Although the facility provided by reference the location of the summary of the groundwater monitoring data obtained during interim status, the facility must provide a general discussion concerning interim status groundwater activities.

A summary of the Interim Status Groundwater Monitoring Data has been added to the Renewal Application in Section E-2.

11. Section E.4: Topographic Map Requirement was not complete. The locations of all groundwater monitoring wells and the point of compliance must be depicted. All requirements of 35 Ill. Adm. Code 703.183(s) and 703.785(c) must be met.

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The Refinery fence system has been added to Figures B-2 through B-6. Access Control Points are shown as blue dots in Figures B-2 through B-6. Figure B-10 has been added to present more detailed descriptions of these access points.

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- a. Copies of the actual analytical reports,*

Copies of the analytical reports have been provided to the Illinois EPA under separate cover.

- b. A map (or maps) showing the locations of all sample points,*

Maps showing the location of all sample points are now provided as Figures I-2 and I-3.

- c. A discussion of the analytical results,*

A discussion of each set of analytical results is included in the UZM Monitoring Reports submitted to the Illinois EPA under separate cover.

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A discussion of any samples that showed a statistically significant increase (SSI) is included in the UZM Monitoring Reports submitted to the Illinois EPA under separate cover.

- e. A table summarizing the results of the UZM program that includes (at minimum) all sample locations, dates, and analytical test results. Any sample results that constitute a SSI should be highlighted on the table.*

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If there are questions or additional information required, please contact me at (630) 257-4450 or Kevin Moss at (630) 257-4452.

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C. W. Harmon, Manager
Health, Safety, Security & Environmental

Attachments

cc: Kevin Moss, Lemont Refinery
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ATTACHMENT 1

**Cross-Reference Table of Notice of Deficiency and Modifications
to the RCRA Part B Renewal Application**

Cross-Reference Table of Notice of Deficiency and Modifications to the RCRA Part B Renewal Application

NOD Number	Notice of Deficiency	Modified Sections ¹	Summary of Modification
1	<u>IEPA Form LPC-PA23</u> : The name and address of the owner is not provided in Section II of this form. This information is required for all RCRA permit applications.	Section II of Illinois EPA Form LPC-PA23	The Owner's name and address have been provided in Section II of the Illinois EPA Form LPC-PA23.
2	<u>IEPA Form LPC-PA23</u> : The owner's name and signature are not provided in Section IV of this form. This information is required for all RCRA permit applications.	Section IV of Illinois EPA Form LPC-PA23; Appendix A.2.4	The Owner's name and signature have been provided in Section IV of the Illinois EPA Form LPC-PA23. The Lemont Refinery's Plant Manager has signatory authority as both the Owner and Operator of the Refinery. A letter from the Assistant Secretary of PDV Midwest Refining LLC, documenting the signatory authority of the refinery's Plant Manager as the Owner is provided in Appendix A.2.4.
3	<u>IEPA Certificate of Authenticity Form</u> : The owner's name and signature are not provided on this form.	Illinois EPA Certificate of Authenticity Form; Appendix A.2.4	The Owner's name and signature have been provided on the Illinois EPA Certificate of Authenticity Form. The Lemont Refinery's Plant Manager has signatory authority as both the Owner and Operator of the Refinery. A letter from the Assistant Secretary of PDV Midwest Refining LLC, documenting the signatory authority of the refinery's Plant Manager as the Owner is provided in Appendix A.2.4.

NOD Number	Notice of Deficiency	Modified Sections¹	Summary of Modification
4	The Part A indicates that the owner and operator are different companies. However, Sections A.1.1 and A.2.2 of the application state that the Vice President & General Manager of the refinery (Bob Kent) has signatory authority as both the owner and operator. Written documentation of this authority needs to be included as part of the application.	Part A Application (Form 8700-12); Section A.1.1; Section A.2.2; Section A.2.4; Appendix A.2.4	<p>A letter from the Assistant Secretary of PDV Midwest Refining LLC, documenting the signatory authority of the Refinery's Plant Manager as the Owner is provided in Appendix A.2.4.</p> <p>Note that the Refinery's "Vice President and General Manager" title was updated to "Vice President and Plant Manager".</p>
5	<u>IEPA Form LPC-PA23</u> : The name, signature, and seal of a Professional Engineer are not provided on this form. Most of the information in the application is technical in nature. Therefore, the name, signature, and seal of a Professional Engineer are required on the LPC-PA23 form.	None	<p>The information contained within the Renewal Application is informational and factual and does not require engineering design or judgment. Therefore, no P.E. seal is currently provided. As we proceed with closure designs or similar efforts a P.E. seal will accompany those submittals.</p> <p>A copy of the permit modification request for the designation of a CAMU at the LTA submitted in December 1997 has been added to the Renewal Application. This document contains engineering designs and judgments and is therefore sealed by a P.E. in the State of Illinois.</p>

NOD Number	Notice of Deficiency	Modified Sections¹	Summary of Modification
6	Sections A.4.1.4, and A.4.2.2: These sections of the decision guide require the permittee to provide documentation that they have complied with the applicable public involvement requirements of RCRA. To date, this documentation has not been received by the Illinois EPA. Documentation of all notices required by Section A.4 of the decision guide must be provided with the response to these completeness review comments. The documentation must meet the requirements specified in the RCRA decision guide.	Sections A.4.1.4 and A.4.2.2	The required documentation was submitted to the Illinois EPA on May 23, 2007, and the Refinery understands that the Agency has received this documentation subsequent to issuing the letter containing the NODs. As such, no action is required on this issue. The Renewal Application was updated to indicate that this information has been provided to the Agency.
7	Section B.2.1.2: An index or other map 'key' that shows the portions of the facility covered by each of the Figures B-2 thru B-6 needs to be provided.	Section B.2.1.2; Table B-2; Figure B-8	A map key has been prepared and included as Figure B-8.

NOD Number	Notice of Deficiency	Modified Sections¹	Summary of Modification
8	<p><u>Section B.2.1.2</u>: All information on Figures B-2 thru B-6 needs to be re-evaluated for accuracy. The following basic map requirements need to be corrected:</p> <ul style="list-style-type: none"> a. The contour lines need to include elevations b. A number of contour lines simply stop c. Some contour lines intersect d. The Des Plaines River is not labeled e. An intermittent stream is located in the Des Plaines River f. The property lines intersect the Chicago Ship and Sanitary Canal, and stop g. The four individual land treatment areas need to be identified on Figure B-5 h. Access control needs to be identified on the figures. 	Section B.2.1.2; Table B-2; Figures B-2 through B-6; Figure B-9; Figure B-10	Figures B-2 through B-6 have been reviewed and updated as needed and a description of associated data limitations has been included in Section B.2.1.2 as well as in the cover letter for this submittal.
9	<u>Section B.3.2, Floodplain Standard</u> : The facility property line and location of the LTAs need to be identified and labeled on the FIRM map provided as Figure B-7.	Figure B-7	The property line and location of the LTAs have been identified on the existing FEMA FIRM map provided as Figure B-7.
10	<u>Section E-2</u> : Interim Status Groundwater Monitoring Data was not complete. Although the facility provided by reference the location of the summary of the groundwater monitoring data obtained during interim status, the facility must provide a general discussion concerning interim status groundwater activities.	Section E.2	A summary of the interim status groundwater monitoring program was added to the Renewal Application.

NOD Number	Notice of Deficiency	Modified Sections¹	Summary of Modification
11	Section E.4: Topographic Map Requirement was not complete. The locations of all groundwater monitoring wells and the point of compliance must be depicted. All requirements of 35 Ill. Adm. Code 703.183(s) and 703.785(c) must be met.	Section E.4; Table E-1; Figure B-5	The UA-series wells, B-series piezometers, point of compliance, and groundwater flow direction are added to Figure B-5. Aquifers are not depicted on figures because they underlie the entire area shown.
12	Section E.6.1: Constituents to be Monitored was not complete. The renewal application only provided a list of indicator parameters. The facility must provide a list of indicator parameters, waste constituents or reaction products to be used in providing a reliable indication of the presence of hazardous constituents in groundwater in accordance with 35 Ill. Adm. Code 724.198(a) and 703.185(1)(1).	None at this time	A thorough review of the historic sampling data as it relates to the groundwater monitoring constituents is nearly complete, but extra time is needed to properly QA this submittal. Per previous discussions with Paula Stine, it was agreed that if additional time was needed a new due date be provided in this NOD response. We expect to submit this specific response to the Agency by August 10, 2007.
13	Section F.1.3, Barrier and Controlled Entry: Figures B-2 thru B-6 need to show the barrier system (fence) surrounding the active portion of the facility and the gates used for access control.	Section F.1; Section F.1.2; Figures B-2 through B-6; Figure B-10	Access Control Points are shown as blue dots in Figures B-2 through B-6. Figure B-10 has been added to present more detailed descriptions of these access points. The fence has also been added to Figures B-2 through B-6.

NOD Number	Notice of Deficiency	Modified Sections¹	Summary of Modification
14	<p>The unsaturated zone monitoring (UZM) program in the original permit required soil cores to be collected from the LTA and analyzed for the parameters specified in the permit. The application to renew the RCRA permit needs to include a report of the analytical results from all soil cores collected from the land treatment area (LTA) to date. The report needs to include the following:</p> <ul style="list-style-type: none"> a. Copies of the actual analytical reports, b. A map (or maps) showing the locations of all sample points, c. A discussion of the analytical results, d. A discussion of how/if any samples that showed a statistically significant increase (SSI) was resolved, and e. A table summarizing the results of the UZM program that includes (at minimum) all sample locations, dates, and analytical test results. Any sample results that constitute a SSI should be highlighted on the table. 	Section I.2.3; Table I-8; Figures I-1 and I-2	Copies of the analytical reports, discussion of the analytical reports, and discussion of SSI results are located in the <u>Annual Unsaturated Monitoring Reports</u> previously submitted to the Illinois EPA. Figures showing the location of all sample points have been added as Figures I-1 and I-2. Table I-8 summarizes the results of the UZM program to date.
15	The financial assurance documents provided in Appendix I.6 are dated 2005. The most recent financial assurance documents need to be provided with the permit application.	Section A.3; Section A.3.1; Section A.3.3; Appendix A.3.3; Appendix I.6; Appendix I.6-A	The latest financial assurance documents (from 2006) are included in Appendix I-6. These documents have been claimed exempt from public disclosure pursuant to 2 IAC 1828. A public version of Section I has also been added as Appendix I.6-A.

NOD Number	Notice of Deficiency	Modified Sections¹	Summary of Modification
NA	Incorporate the Refinery's previous request to operate the land treatment area as a CAMU into the Renewal Application.	Section I.1; Appendix I.1	A copy of the permit modification request for the designation of a CAMU at the LTA submitted in December 1997 has been added to the Renewal Application as Appendix I.1.
NA	NA	Table of Contents; Introduction; Tables A-2 and A-3;	The Table of Contents, Introduction, and Tables A-2 and A-3 (which provide a list of all documents in the public repository related to the RCRA Permit Application) have been updated to reflect the modifications to the Renewal Application in response to the NOD.

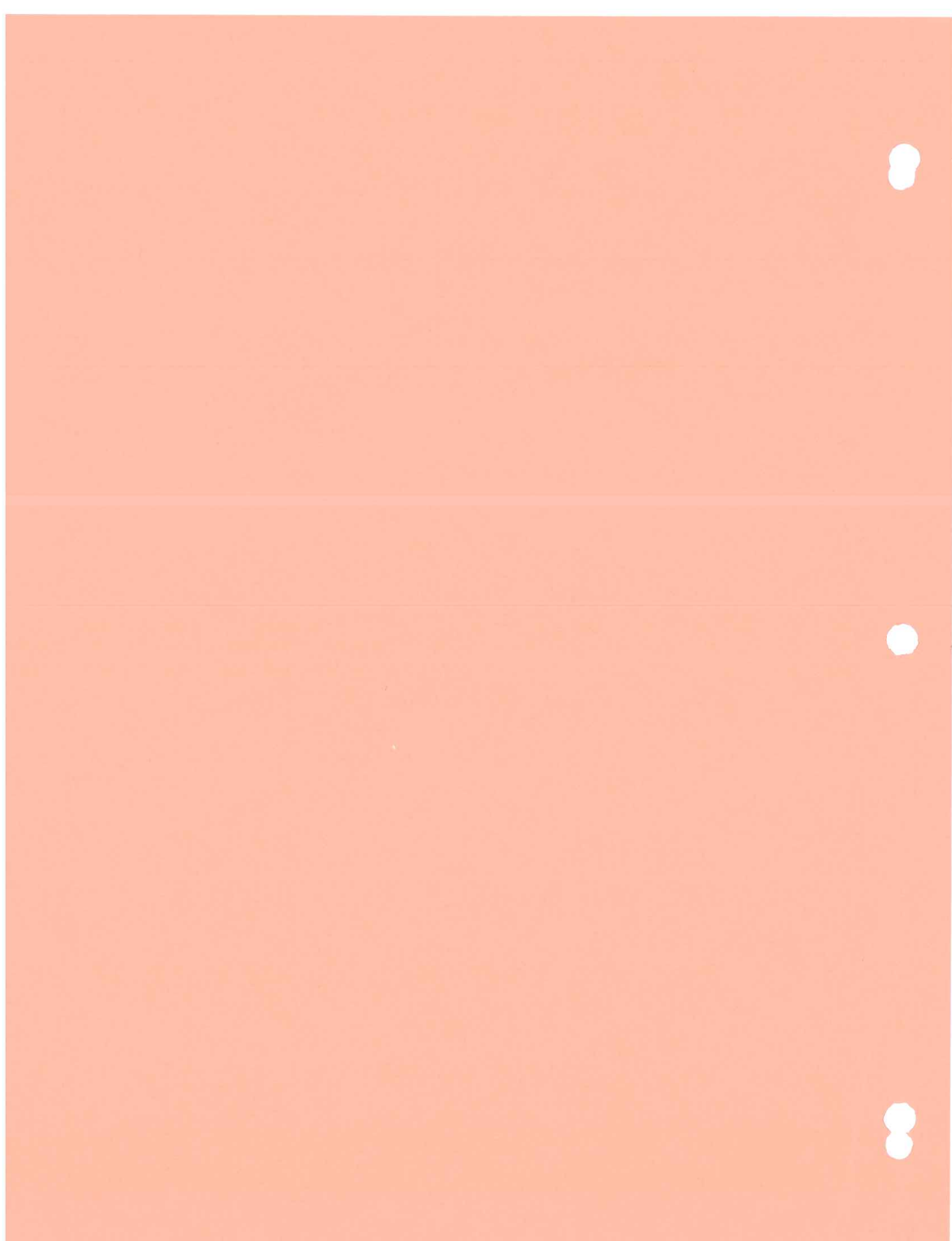
¹ Modified pages are marked with the revision date of July 31, 2007. Note that when a change to the text shifted the pagination of the following sections, those pages are also marked with the July 31, 2007, revision date.

ACRONYMS AND ABBREVIATIONS:

Decision Guide	Illinois Environmental Protection Agency Resource Conservation and Recovery Act Part B Permit Application Decision Guide (2006)
FEMA	Federal Emergency Management Agency
FIRM	Federal Insurance Rate Map
IAC	Illinois Administrative Code
Illinois EPA	Illinois Environmental Protection Agency
RCRA	Resource Conservation and Recovery Act
Renewal Application	Lemont Refinery RCRA Part B Permit Renewal Application submitted April 23, 2007
Refinery	CITGO Petroleum Company, Lemont, Illinois, Refinery
LTA	Land Treatment Area
UZM	Unsaturated Zone Monitoring
SSI	Statistically Significant Increase

ATTACHMENT 2

Replacement Pages



**RENEWAL PART B PERMIT APPLICATION
VOLUME 1**

**Remove IEPA Form LPC-PA23
and replace with the attached IEPA Form LPC-PA23.**



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. SITE IDENTIFICATION

Site # (Illinois EPA): 1978030004 USEPA ID Number: ILD041550567
Site Name: The Lemont Refinery, CITGO Petroleum Corporation, Lemont, IL
Physical Site Location (street, road, etc.): 135th Street & New Avenue
City, Zip Code: Lemont, 60439-3655 County: Will
Existing RCRA Permit (if applicable): RCRA Hazardous Waste Management Post Closure Permit

II. OWNER/OPERATOR IDENTIFICATION

OWNER

OPERATOR

Name: <u>PDV Midwest Refining LLC</u>	<u>CITGO Petroleum Corporation</u>
Address: <u>750 Lexington Ave 10th Floor</u>	<u>135th Street & New Avenue</u>
<u>New York, NY 10022</u>	<u>Lemont, Illinois 60439-3655</u>
Contact Name: <u>Robert Kent</u>	<u>Robert Kent</u>
Phone #: <u>(630) 257-4000</u>	<u>(630) 257-4000</u>

III. PERMIT APPLICATION IDENTIFICATION

APPLICATION TYPE:

- ☐ New Part B Permit
☒ Part B Permit Renewal
☐ Class 1 Modification
☐ Class 1* (prior approval required) Modification
☐ Class 2 Modification
☐ Class 3 Modification
☐ Additional information to supplement application Log Number _____

APPLICATION TYPE cont.:

- ☐ Remedial Action Plan Permit (RAPP)
☐ Sig RAPP Modification
☐ Non Sig RAPP Modification
☐ Major UIC Modification
☐ Minor UIC Modification

THIS APPLICATION INVOLVES:

- ☐ Storage
☒ Treatment
☐ Disposal
☐ Incineration
☐ Groundwater
☒ Corrective Action
☐ UIC Class I
☐ UIC Class V

DESCRIPTION OF THIS PERMIT REQUEST: (Include a brief narrative description here.)

This permit is for post closure care of the Land Treatment Facility.

IL 532-2792
LPC 625

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

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PERMIT SECTION

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

OWNER

☐

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

☐

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Name (Printed or Typed): Robert Kent

Owner Signature: Robert Kent Title: PLANT MANAGER Date: JULY 27, 2007

OPERATOR

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

Operator Name (Printed or Typed): Robert Kent

Operator Signature: Robert Kent Title: PLANT MANAGER Date: JULY 27, 2007

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this 30 day of JULY, 2007

Notary Signature: Diane S. Carcara Notary Seal:

My commission expires on: 10-24-07



ENGINEER

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

Engineer Name (Printed or Typed): _____

Engineer Signature: _____ Illinois License No.: _____

Expiration Date of License: _____

Engineer Address: _____ Engineer Seal: _____

Engineer Phone No. _____

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1**

**Remove Certification of Authenticity of Official Forms
and replace with the attached Certification of Authenticity of Official Forms.**



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

Certification of Authenticity of Official Forms

This form must accompany any application submitted to the Illinois EPA Bureau of Land, Division of Land Pollution Control, Permit Section on forms other than the official copy printed and provided by the Illinois EPA. The only allowed changes to the form are in spacing, fonts, and the addition of the information provided. Any additions must be underlined. The forms would not be considered identical if there is any change to, addition or deletion of words on the form or to the language of the form.

The same individuals that sign the application form it accompanies must sign the following certification.

I hereby certify under penalty of law that I have personally examined, and am familiar with the application form or forms and all included supplemental information submitted to the Illinois EPA herewith, and that the official Illinois Environmental Protection Agency application form or forms used herein is or are identical in all respects to the official form or forms provided by the Illinois EPA Bureau of Land Permit Section, and has not or have not been altered, amended, or otherwise modified in any way. I further certify under penalty of law that any attached or included electronic data version of the application form or forms complies with the official Illinois EPA's Electronic version thereof, and is or are identical in all respects to the official electronically downloadable form or forms provided by the Illinois EPA Bureau of Land Permit Section, and has not or have not been altered, amended or otherwise modified in any way.

Bob Kent
Owner Signature

July 30, 2007
(date)

Vice President and Plant Manager
Title

Bob Kent
Operator Signature

July 30, 2007
(date)

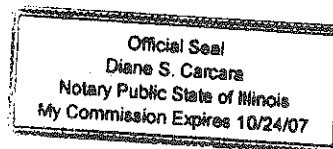
Vice President and Plant Manager
Title

Engineer Signature
(if necessary)

(date)

*Subscribed and Sworn to Before Me,
a Notary Public in and for the
above-mentioned County and State.*

Diane S. Carcare
Notary Public



My Commission Expires: 10-24-07

[Notary Seal]

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AUG 01 2007
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PERMIT SECTION

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, COVER PAGE**

**Remove Cover Page
and replace with the attached Cover Page.**

**RCRA PERMIT RENEWAL APPLICATION
THE LEMONT REFINERY
CITGO PETROLEUM CORPORATION
Lemont, Illinois**

Submitted by:

The Lemont Refinery

**April 23, 2007
Revised July 31, 2007**

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, TABLE OF CONTENTS**

**Remove Table of Contents
and replace with the attached Table of Contents.**

TABLE OF CONTENTS

Illinois Environmental Protection Agency Checklist

Introduction

A Forms, Certifications, Confidentiality, and Public Involvement

- A.1 Forms and Permits
 - A.1.1 RCRA Part A Permit Application
 - A.1.2 Permits or Construction Approvals
- A.2 Certifications
 - A.2.1 Siting Certification
 - A.2.2 Facility Certification
 - A.2.3 Technical Information Certification
 - A.2.4 Prior Conduct Certification
- A.3 Public Disclosure Exemption Claims and Trade Secret Claims
 - A.3.1 Information Claimed Exempt from Public Disclosure
 - A.3.2 Trade Secrets Claims
 - A.3.3 Exempt or Exempt-In-Part Data Claims
 - A.3.4 Justification Letter
 - A.3.5 Privileged Information
- A.4 Public Participation
 - A.4.1 Facility Mailing List and Information Repositories
 - A.4.1.1 Facility Mailing List
 - A.4.1.2 Identification of Repositories
 - A.4.1.3 Contents of Repository, Public Notice of Repository Availability
 - A.4.1.4 Documentation of Public Notices of Repositories
 - A.4.2 Notification of Permit Application Submittal
 - A.4.2.1 Content of Permit Application Notice
 - A.4.2.2 Documentation of Permit Application Notice
 - A.4.2.3 New Combustion Units
 - A.4.3 Pre-application Meeting

B Facility Description

- B.1 General Description
 - B.1.1 Operation of Facility
 - B.1.2 Process Flow Diagram
 - B.1.3 Units
- B.2 Topographic Map
 - B.2.1 General Map Requirements

	B.2.1.1	Facility + One Mile
	B.2.1.2	Facility + 1,000 Feet
	B.2.2	Additional Map Requirements for New Land Disposal Facilities
	B.2.3	Legal Description
B.3		Location Standards
	B.3.1	Seismic Standard
	B.3.2	Floodplain Standard
	B.3.3	Facilities in the 100-Year Floodplain
	B.3.4	Existing Facilities not in Compliance with 35 IAC 724.118(b)
B.4		Traffic Information
B.5		Operating Record
	B.5.1	Contents of Operating Record
	B.5.2	Installation of Tanks
C		Waste Characteristics
D1		Containers
D2		Tank Systems
D3		Waste Piles
D4		Surface Impoundments
D5		Incinerators
D6		Landfills
D7		Land Treatment
D10		Miscellaneous Units
E		Groundwater Monitoring
	E.1	Exemption from Groundwater Protection Requirements
	E.2	Interim Status Groundwater Monitoring Data
	E.3	Historical Hydrogeological Summary
	E.4	Topographic Map Requirements
	E.5	Contaminant Plume Description
	E.6	Detection Monitoring Program
	E.6.1	Indicator Parameters, Waste Constituents, Reaction Products to be Monitored
	E.6.2	General Monitoring Program Requirements
	E.6.3	Groundwater Monitoring System
	E.6.4	Description of Sampling and Analysis Procedures
	E.6.5	Evaluation of Groundwater Surface

	E.6.6	Background Quality
	E.6.7	Statistical Evaluations
	E.6.8	Statistically Significant Increases
	E.7	Compliance Monitoring Program
	E.8	Corrective Action Program
	E.9	Reporting Requirements
	E.10	Description of Corrective Action for Solid Waste Management Units
F		Procedures to Prevent Hazards
	F.1	Security
		<i>Claimed Exempt in the Public Record Version</i>
	F.1.1	Waiver from the Security Requirements
	F.1.2	24-Hour Surveillance System
		<i>Claimed Exempt in the Public Record Version</i>
	F.1.3	Barrier and Controlled Entry
		<i>Claimed Exempt in the Public Record Version</i>
	F.1.4	Warning Signs
	F.2	Inspection Requirements
	F.2.1	Inspection Log
		F.2.1.1 Items Inspected
		F.2.1.2 Types of Problems
		F.2.1.3 Inspection Frequency
	F.2.2	Repair Log
		F.2.2.1 Contents of Repair Log
		F.2.2.2 Repair Times
	F.2.3	Container and Container Storage Area Inspection
	F.2.4	Tank System Inspection
	F.3	Equipment Requirements
	F.3.1	Waiver
	F.3.2	Internal Communications
		<i>Claimed Exempt in the Public Record Version</i>
	F.3.3	External Communications
		<i>Claimed Exempt in the Public Record Version</i>
	F.3.4	Water for Fire Control
		<i>Claimed Exempt in the Public Record Version</i>
	F.3.5	Testing and Maintenance of Emergency Equipment
		F.3.5.1 Equipment Testing
		F.3.5.2 Schedule
	F.3.6	Aisle Space
	F.4	Preventive Procedures, Structures, and Equipment
	F.4.1	Unloading Operations
	F.4.2	Run-off
	F.4.3	Water Supplies
	F.4.4	Equipment and Power Failure
	F.4.5	Personnel Protection Equipment

G Evaluation-Assessment of Potential Hazards and Contingency Plan

H Personnel Training

- H.1 Training Program
 - H.1.1 Training Director
 - H.1.2 Job Title – Job Description
 - H.1.3 Relevance of Training to Job Position
 - H.1.4 Outlines of Training Programs
 - H.1.4.1 Training Content, Frequency and Techniques
 - H.1.4.2 Training for Emergency Response
- H.2 Implementation of Introductory and Continuing Training Programs
 - H.2.1 Completion of Training
 - H.2.2 Recordkeeping

I Closure and Post-Closure Requirements

- I.1 Closure Plan
 - I.1.1 Closure Performance Standard
 - I.1.1.1 General Requirements
 - I.1.1.2 Specific Requirements
 - I.1.2 Maximum Operations and Waste Inventory
 - I.1.3 Partial Closure
 - I.1.4 Closure Methods
 - I.1.5 Removal and Decontamination Procedures
 - I.1.6 Other Activities
 - I.1.7 Unit Specific Closure Activities
 - I.1.7.1 Closure of Container Storage Areas
 - I.1.7.2 Closure of Tank Systems
 - I.1.8 Closure Schedule
 - I.1.9 Expected Year of Final Closure
 - I.1.10 Alternate Requirements
- I.2 Post-Closure Plan
 - I.2.1 Applicability
 - I.2.2 Post-Closure Inspection Plan
 - I.2.2.1 Items Inspected
 - I.2.2.2 Types of Problems
 - I.2.2.3 Inspection Frequency
 - I.2.2.4 Documentation of Inspection
 - I.2.2.5 Repair Log
 - I.2.2.6 Contents of Repair Log
 - I.2.2.7 Repair Times
 - I.2.3 Post-Closure Monitoring Plan
 - I.2.4 Post-Closure Maintenance Plan
 - I.2.4.1 Procedures, Equipment, and Materials
 - I.2.4.2 Rationale

- I.3 Survey Plat
 - I.3.1 Identify Units/Areas
 - I.3.2 Note on Plat
 - I.3.3 Certification of Plat
 - I.3.4 Recording of Survey Plat
 - I.3.5 Existing Facilities with Closed Disposal Units
- I.4 Notice in Deed and Certification
 - I.4.1 Notice in Deed
 - I.4.2 Certification of Notification
 - I.4.3 Existing Facilities with Closed Disposal Units
- I.5 Closure Cost Estimate
 - I.5.1 Third Party Costs
 - I.5.2 Maximum Cost Estimate
 - I.5.3 Unit Costs
 - I.5.4 Annual Updates
- I.6 Financial Assurance Mechanism for Closure
- I.7 Post-Closure Cost Estimate
 - I.7.1 Third Party Costs
 - I.7.2 Unit Costs
 - I.7.3 Annual Cost Estimate
 - I.7.4 Post-Closure Cost Estimate
 - I.7.5 Annual Updates
- I.8 Financial Assurance Mechanism for Post-Closure Care
- I.9 Liability Requirements
 - I.9.1 Copies of Financial Assurance Documentation
 - I.9.2 Request for Variance
- I.10 State Mechanisms

J Other Federal Laws

K Corrective Action

- K.1 Identification of Solid Waste Management Units
- K.2 Characterization of the SWMUs
- K.3 Characterization of Releases from SWMUs
- K.4 Information Required in the Renewal Application
 - K.4.1 Required Information if USEPA Oversaw Initial Corrective Action Program
 - K.4.2 Required Information if Illinois EPA Oversaw Initial Corrective Action Program
 - K.4.2.1 Chronology of Corrective Action Efforts to Date
 - K.4.2.2 Corrective Action Correspondence With Illinois EPA
 - K.4.2.3 Solid Waste Management Units
 - K.4.2.4 Groundwater Monitoring

AA Air Emission Standards for Process Vents

BB Air Emission Standards for Equipment Leaks

CC Air Emission Standards for Tanks, Surface Impoundments, and Containers

- CC.1 Exemptions from Subpart CC
- CC.2 Exemptions from 35 IAC 724.984 through 724.987 and 40 CFR 264.1084 through 264.1087
- CC.3 Standards for Tanks
- CC.4 Standards for Surface Impoundments
- CC.5 Standards for Containers
 - CC.5.1 Level 1 Standards
 - CC.5.1.1 Containers
 - CC.5.1.2 Covers and Closure Devices
 - CC.5.2 Level 2 Standards
 - CC.5.2.1 Container
 - CC.5.2.2 Covers, Closure Devices, Pressure Relief Devices, and Safety Device
 - CC.5.3 Level 3 Standard
- CC.6 Waste Transfer
- CC.7 Repairs
- CC.8 Standards for Closed-vent Systems and Control Devices
- CC.9 Inspection and Monitoring Requirements
 - CC.9.1 Compliance with 35 IAC 724.984 through 724.987 and 40 CFR 264.1084 through 264.1087
 - CC.9.2 Implementation of a Written Plan
- CC.10 Record Keeping Requirements
- CC.11 Reporting Requirements

LIST OF TABLES

A-1	Other Environmental Permits
A-2	Permit Application Documents at the Lemont Public Library District
A-3	Permit Application Documents at the Lemont Village Hall
B-1	Waste Management Units Present at the Refinery
B-2	Facility Map Requirements Cross-Reference Table
B-3	Wells Within 1000 Feet of the Refinery's Property Boundary
E-1	Facility Map Requirements Cross-Reference Table
E-2	Hydraulic Properties of the Uppermost Aquifer
E-3	Indicator Parameters for Groundwater Samples
E-4	Well and Groundwater Elevation Data
E-5	Construction Details of Wells and Piezometers
E-6	Sample Container and Preservative Specifications for Groundwater Samples
E-7	Preparatory and Analytical Methods for Groundwater Samples
E-8	Acceptance Criteria for Quality Control Samples
E-9	Derived Background Values—Groundwater Monitoring Program
E-10	Illinois EPA Groundwater Database Well UA-1 Values – 1998-2006
F-1	Land Treatment Facility Typical Inspection Schedule
F-2	Emergency Equipment Inspection Schedule
F-3	Justification for Inspection Frequencies
H-1	Refinery Positions Related to RCRA Hazardous Waste Management Activities
I-1	Maximum Inventory of Waste Treated at the LTF
I-2	Closure Schedule for the CAMU
I-3	Analytical Parameters for UA-Series Wells
I-4	Derived Background Values-Groundwater Monitoring Program
I-5	Modified Skinner Constituents for Analysis
I-6	Unsaturated Zone Constituents for Analysis
I-7	Complete Unsaturated Zone Monitoring Parameter List and Associated Monitoring Limits
I-8	Summary of Soil Analytical Data for Unsaturated Zone Monitoring – Years 1-10
I-9	Closure Cost Estimate
I-10	Post-Closure Cost Estimate
K-1	Chronology of Corrective Action Efforts to Date
K-2	Corrective Action Correspondence
K-3	Waste Management Units Present at the Refinery
CC-1	Container Control Levels

LIST OF FIGURES

B-1	Facility + 1 Mile
B-2	Facility + 1000 feet (1 of 5)
B-3	Facility + 1000 feet (2 of 5)
B-4	Facility + 1000 feet (3 of 5)
B-5	Facility + 1000 feet (4 of 5)
B-6	Facility + 1000 feet (5 of 5)
B-7	FEMA FIRM Map for Will County, Illinois
B-8	Key Map
B-9	USGS Topographic Contours
B-10	Detailed Access Point Descriptions
E-1	Geologic Cross-Section A-A'
E-2	Geologic Cross-Section F-F'
E-3	Cross-Section Locations
E-4	Locations of Monitor Wells and Piezometers
E-5	Potentiometric Surface Contour Map 4 th Quarter 2006 (Trihydro Corporation)
E-6	B-Series Piezometers Potentiometric Surface – October 2006 (Shaw)
E-7	UA-Series Wells Potentiometric Surface – October 2006 (Shaw)
E-8	Example Sample Label
E-9	Example Chain-of-Custody Form
E-10	Example Custody Seal
I-1	LTF Area I Soil-Core Sample Locations – November 2006
I-2	LTF Area II – IV Soil-Core Sample Locations –November 2006
K-1	Solid Waste Management Unit Location Map

LIST OF APPENDICES

- A.1.1 RCRA Part A Permit Application
 - Attachment 1 List of Other Environmental Permits
 - Attachment 2 Topographic Map
 - Attachment 3 Facility Drawing & Aerial Photograph
- A.2.2 Facility Certification
- A.2.4 Prior Conduct Certifications
- A.3.3 Claim and Justification Letter for Exempt Data Claims
- A.4.1.1 Facility Mailing List
- A.4.1.4 Public Notice of Repository Availability and Permit Renewal Application Submittal
- A Versions of the Prior Conduct Certifications Available for Public Review
- B.2.3 Legal Descriptions of Property Owned by the Refinery
- E.6.2 Groundwater Sampling and Analysis Plan (Geraghty & Miller, Inc., December 1996)
- E.6.3 Well Completion Reports
- F.2.1 Typical Inspection Logs
- F.3.4 Certification of Adequate Water Volume and Pressure
- F Version of Section F Available for Public Review
- H.2.2.2 Example Training Record
- I.1 CAMU Permit Modification Request
- I.1.5 Soil-Core Sampling Standard Operating Procedures
- I.1.6-1 Unsaturated Zone Monitoring Plan and Addendum
- I.1.6-2 Groundwater Monitoring Plan and Addendum
- I.2.2 Facility Inspection Form
- I.2.2.6 Repair Log
- I.6 Financial Assurance Documentation
 - Claimed Exempt in the Public Record Version***
- I.6-A Version of Appendix I.6 Available for Public Review
- K.4.2.2-1 Chronological Summary of Correspondence Between Illinois EPA and the Lemont Refinery
- K.4.2.2-2 Chronological Copies of Letters and Permits Between the Illinois EPA and the Lemont Refinery

LIST OF ACRONYMS AND ABBREVIATIONS

°C	Degrees Celsius (Centigrade)
%CV	Relative Standard Deviation
°F	Degrees Fahrenheit
1990 Decision Guide	<u>Illinois EPA RCRA Part B Permit Application Decision Guide</u> (December 1990)
2006 Decision Guide	<u>Illinois EPA RCRA Part B Permit Application Decision Guide</u> (July 2006)
2006 Checklist	<u>Illinois EPA RCRA Part B Hazardous Waste Permit Application</u> <u>Completeness and Technical Evaluation Checklist</u> (July 2006)
AAS	Atomic Absorption Spectrometry
AASHO	American Association of State Highway Officials
ACL	Alternate Concentration Level
Act	Illinois Compiled Statutes Environmental Safety Environmental Protection Act
AEL	Appropriate Exposure Limit
Agency	U.S./Illinois Environmental Protection Agency
amsl	Above mean sea level
ANPR	Advanced Notice of Proposed Rulemaking
AOC	Area of Concern
API	American Petroleum Institute
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
atm	Atmospheres
bbl	Barrels
bgs	Below ground surface
BTZ	Below Treatment Zone
bpd	Barrels per Day
BTEX	Benzene, Toluene, Ethylbenzene, And Xylene
BIF	Boilers and Industrial Furnace
BOD ₅	Five-Day Biological Oxygen Demand
BP	Boiling Point
BTC	Background Threshold Concentration
BTU	British Thermal Units
BTZ	Below Treatment Zone
C	Ceiling
CAA	Clean Air Act
CAAPP	Clean Air Act Permit Program
CAMU	Corrective Action Management Unit
CAS	Chemical Abstracts Service Registry
CBT	computer-based training

LIST OF ACRONYMS AND ABBREVIATIONS (cont.)

CCR	Current Conditions Report
CFR	Code of Federal Regulations
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
CO	Carbon Monoxide
COC	Contaminants of Concern
COD	Chemical Oxygen Demand
COLIWASA	Composite Liquid Waste Sampler
CSM	Conceptual Site Model
CSSO	Central Security Services Office
CV	Coefficient of Variation
CWA	Clean Water Act
DOT	Department of Transportation
DQL	Data Quality Level
DRO	Diesel-Range Organic
ECD	Electron Capture Detector
EEGL	Emergency Exposure Guidance Limit
EI	Environmental Indicator
E&I	Electrical and Instrument
EPA	Environmental Protection Agency
EQL	Estimated Quantitation Limit
ERPG	Emergency Response Planning Guidelines
ERT	Environmental Response Team
ELUC	Environmental Land Use Controls
FCC	Fluid Catalytic Cracking Unit
FCCU	Fluid Catalytic Cracking Unit
FEMA	Federal Emergency Management Agency
FID	Flame-Ionization Detector
FIRM	Flood Insurance Rate Map
FOIA	Freedom of Information Act
g	Gram
gal.	Gallon
GC	Gas Chromatography
GDU	Gasoline Desulfurization Unit
GPD	Gallons Per Day

LIST OF ACRONYMS AND ABBREVIATIONS (cont.)

GPRA	Government Performance and Results Act
GRO	Gasoline-Range Organic
GMZ	Groundwater Management Zone
HAZWOPER	Hazardous Waste Operations and Emergency Response
HBL	Health-Based Level
HDPE	High-Density Polyethylene
HEBCA	Heat Exchanger Bundle Cleaning Area
HEXB	Heat Exchanger Bundle(s)
HF	Hydrofluoric
HF alky	Hydrofluoric alkylation (neutralization basin)
hPa	HectoPascals
HPLC	High-Performance Liquid Chromatography
HSA	Hollow Stem Auger
HSWA	Hazardous and Solid Waste Amendments
HWMF	Hazardous Waste Management Facility
HWMU	Hazardous Waste Management Unit
HSS&E	Health, Safety, Security, and Environmental
IAC	Illinois Administrative Code
IBC	Intermediate Bulk Container
ICPES	Inductively Coupled Plasma Emission Spectrometry
ICP-MS	Inductively Coupled Plasma – Mass Spectrometry
ID	Identification
IDL	Instrument Detection Limit
IDLH	Extremely Dangerous to Life or Health
IDOT	Illinois Department of Transportation
IL ELAP	Illinois Environmental Laboratory Accreditation Program
Ill. Rev. Stat.	Illinois Revised Statute
Illinois EOU	Illinois Emergency Operations Unit
IPCB	Illinois Pollution Control Board
IR	Infrared Spectrometry
kPa	KiloPascals
lb.	Pound
lbs.	Pounds
LCS	Laboratory Control Sample
LDR	Land Disposal Restriction
LEL	Lower Explosive Limit
LIMS	Laboratory Information Management System
LOQ	Limit of Quantitation
LTA	Land Treatment Area
LTF	Land Treatment Facility
LTL	Lower Tolerance Limit

LIST OF ACRONYMS AND ABBREVIATIONS (cont.)

MDEA	Monodiethanol amine
MDL	Method Detection Limit
MEA	Monoethanol amine
mg/kg	Milligram/kilogram
Misc.	Miscellaneous
mL	Milliliter
MOSC	Mobile Oil Sludge Coking
mph	Miles per hour
MPRSA	Marine Protection, Research, and Sanctuaries Act
MS	Mass Spectrometry
MS	Matrix Spike
MSD	Matrix Spike Duplicate
MSDS	Material Safety Data Sheet
MTBE	Methy Tert-Butyl Ether
MTR	Minimum Technology Requirement
MW	Molecular Weight
NA	North America (or Not Applicable)
NACE	National Association of Corrosion Engineers
NAPL	Non-aqueous Phase Liquids
NCDC	National Climatic Data Center
NELAP	National Environmental Laboratory Accreditation Program
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFA	No Further Action
NFPA	National Fire Prevention Association
NIOSH	National Institute for Occupational Safety and Health
NIST	National Institute of Standards and Testing
NP	Not Performed
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
NTUS	Nephelometric Turbidity Units
OJT	On-the-Job Training
OPA	Oil Pollution Act
OSHA	Occupations Safety and Health Administration
Pa	Pascals
PAC	Powdered Activated Carbon
PAH	Polynuclear Aromatic Hydrocarbons
P.E.	Professional Engineer
PID	Photo Ionization Detector
PMP	Perimeter Monitoring Program
POC	Point of Compliance
PPB	Parts Per Billion
PPE	Personal Protective Equipment

LIST OF ACRONYMS AND ABBREVIATIONS (cont.)

ppm	Parts per million
ppm _v	Parts per million by volume
PQL	Practical Quantitation Limit
PSD	Prevention of Significant Deterioration
PVC	Polyvinyl Chloride
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RAGS	<u>Risk Assessment Guidance for Superfund</u>
RCRA	Resource Conservation and Recovery Act
RCRIS	RCRA Information System
Refinery	Lemont, Illinois, Refinery
Renewal Application	RCRA Part B Permit Renewal Application
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RGN	Reactivity Group Number
RO	Remediation Objective
RPD	Relative Percent Difference
SCBA	Self-Contained Breathing Apparatus
SCFPU	Special Coker Feed Preparation Unit
SDWA	Safe Drinking Water Act
SG	Specific Gravity
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasures
SPEGL	Short-Term Public Emergency Guidance Level
SPLP	Synthetic Precipitation Leaching Procedure
SR	State Route
STEL	Short-Term Exposure Limit
SVOC	Semivolatile Organic Compound
SW-846	<i>Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods</i> (U.S. EPA, Office of Solid Waste, Third Edition)
SWMU	Solid Waste Management Unit
SWPPP	Stormwater Pollution Prevention Plan
TACO	Tiered Approach to Corrective Action Objectives
TCLP	Toxicity Characteristic Leaching Procedure
TLV	Threshold Limit Value
TOC	Total Organic Carbon
TOX	Total Organic Halides
TPH	Total Petroleum Hydrocarbons

LIST OF ACRONYMS AND ABBREVIATIONS (cont.)

TRPH	Total Recoverable Petroleum Hydrocarbons
TRMA	Three Rivers Manufacturers' Association
TSDF	Treatment, Storage, and Disposal Facility
TU	Temporary Unit
TWA	Time-Weighted Average
UEL	Upper Exposure Limit
ug	Micrograms
ug/kg	Microgram/kilogram
UHC	Underlying Hazardous Constituent
UIC	Underground Injection Control
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
UTL	Upper Tolerance Limit
UTS	Universal Treatment Standard
UZM	Unsaturated Zone Monitoring
VCA	Voluntary Corrective Action
VHF	Very High Frequency
VOC	Volatile Organic Compound
VP	Vapor Pressure
VSI	Visual Site Inspection
WCSA	Waste Container Storage Area
WWTP	Wastewater Treatment Plant
WWTU	Wastewater Treatment Unit
ZOI	Zone of Incorporation

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1,
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY CHECKLIST**

Remove Illinois Environmental Protection Agency RCRA Part B Hazardous Waste Permit Application Completeness & Technical Evaluation Checklist and replace with the attached Illinois Environmental Protection Agency RCRA Part B Hazardous Waste Permit Application Completeness & Technical Evaluation Checklist.

Revised: July 2006

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
RCRA PART B HAZARDOUS WASTE PERMIT APPLICATION
COMPLETENESS & TECHNICAL EVALUATION CHECKLIST**

Facility Name: The Lemont Refinery____
Log No.: B-162_____
State ID No.: _____
USEPA No.: ILD041550567_____

Date application received: _____
Revision No.: _____
Reviewer: _____
Review Dates: _____

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
A	Forms, Certifications, Confidentiality, Public Involvement	Y		Volume I, Section A	
A.1	Forms	Y		Section A.1	
A.1.1	Part A Application	Y		Appendix A.1.1	
A.1.2	Other Permits	Y		Section A.1.2; Table A-1; Appendix A.1.1, Attachment 1	
A.2	Certifications	Y		Section A.2	
A.2.1	Siting Certification	N		Section A.2.1	Not applicable; the facility is not a pollution-control facility or a new facility
A.2.2	Facility Certification	Y		Appendix A.2.2	
A.2.3	Technical Information Certification	Y		Section A.2.3	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
A.2.4	Prior Conduct Certification	Y		Section A.2.4; Appendix A.2.4; Appendix A	
A.3	Public Disclosure Exemption Claims and Trade Secret Claims	Y		Section A.3	
A.3.1	No information Claimed Exempt from Public Disclosure	Y		Section A.3.1; Appendix A.2.4; Section F	
A.3.2	Trade Secrets Claims	Y		Section A.3.2	Not applicable; the facility is not claiming any parts of the Renewal Application as exempt on the basis of trade secrets
A.3.3	Exempt, or Exempt In-Part Data Claims	Y		Section A.3.3; Appendix A.2.4; Section F	
A.3.4	Justification Letter	Y		Appendix A.3.3	
A.3.5	Privileged Information	Y		Section A.3.5	Not applicable; the facility is not claiming any parts to the Renewal Application as exempt on the basis of privileged information
A.4	Public Participation	Y		Section A.4	
A.4.1	General	Y		Section A.4.1	
A.4.1.1	Facility Mailing List	Y		Appendix A.4.1.1	
A.4.1.2	Identification of Repositories	Y		Section A.4.1.2	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
A.4.1.3	Contents of Repository Public Notice	Y		Section A.4.1.3; Tables A-2 and A-3; Appendix A.4.1.4	
A.4.1.4	Documentation of Public Notice of Repositories	Y		Section A.4.1.4; Appendix A.4.1.4	
A.4.2	Notification of Permit Application Submittal	Y		Section A.4.2; Appendix A.4.1.4	
A.4.2.1	Contents of Permit Application Notice	Y		Section A.4.2.1; Appendix A.4.1.4	
A.4.2.2	Documentation of Permit Application Notice	Y		Section A.4.2.2	
A.4.2.3	New Combustion Units	Y		Section A.4.2.3	Not applicable; the facility is not applying for new boilers and industrial furnaces or new incinerators
A.4.3	Initial RCRA Permits & Permit Renewals with a Significant Modification	Y		Section A.4.3	
A.4.3.1	Pre-Application Public Meeting	N			Not applicable; a pre-application meeting is not required for conduction post-closure or corrective action at a facility
A.4.3.2	Public Notice of Pre- Application Meeting	N			Not applicable; a pre-application meeting is not required for conduction post-closure or corrective action at a facility
A.4.3.3	Content of Pre-application Meeting Notice	N			Not applicable; a pre-application meeting is not required for conduction post-closure or corrective action at a facility

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
B	Facility Description	Y		Volume I, Section B	
B.1	General Description	Y		Section B.1	
B.1.1	Operation of Facility	Y		Section B.1.1	
B.1.2	Process Flow Diagram	Y		Section B.1.2	
B.1.2	Units	Y		Section B.1.3; Table B.1; Figures B-2 through B-10; Section I; Section K.4.2.3; Table K- 3; Figure K-1	
B.2	Topographic Map Requirements	Y		Section B.2	
B.2.1	General Map Requirements	Y		Section B.2.1	
B.2.1.1	Map of Area Extending 1 Mile Beyond the Property Boundary	Y		Section B.2.1.1; Figure B-1	
B.2.1.2	Map of Entire Facility and 1000' Out from the Property Line	Y		Section B.2.1.2; Table B-2; Figures B-2 through B-10	
B.2.2	Additional Map Requirements for New Land Disposal Facilities	Y		Section B.2.2	Not applicable; facility is not planning any new disposal facilities

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
B.2.3	Legal Description	Y		Appendix B.2.3	
B.3	Location Standards	Y		Section B.3	
B.3.1	Seismic Standard	Y		Section B.3.1	
B.3.2	Floodplain Standard	Y		Section B.3.2; Figure B-7	
B.3.3	Facilities in the 100 Year Floodplain	Y		Section B.3.3; Figure B-7	
B.3.3.1	Engineering Analysis of Hydrodynamic & Hydrostatic Forces	N			Not applicable; the LTF is not within the 100-yr floodplain
B.3.3.2	Structural or Engineering Study	N			Not applicable; the LTF is not within the 100-yr floodplain
B.3.3.3	Procedures to Remove Waste	N			Not applicable; the LTF is not within the 100-yr floodplain
B.3.4	Existing Facilities not in Compliance with Floodplain Requirements	Y		Section B.3.4	
B.4	Traffic Information	Y		Section B.4	
B.5	Operating Record	Y		Section B.5	
B.5.1	Contents of Operating Record	Y		Section B.5.1	
B.5.2	Installation of Tanks	N		Section B.5.2	Not applicable; RCRA-regulated tanks are not present at the facility
C	Waste Characteristics	Y		Volume I; Section C	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
C.1	Chemical And Physical Analyses	N			Not applicable; not required for post-closure care permit application
C.1.1	General Chemical Information and Analyses	N			Not applicable; not required for post-closure care permit application
C.1.2	Physical Properties and Toxicity Information	N			Not applicable; not required for post-closure care permit application
C.1.3	Land Disposal Restrictions	N			Not applicable; not required for post-closure care permit application
C.1.3.1	For Generators	N			Not applicable; not required for post-closure care permit application
C.1.3.2	For Disposal Facilities	N			Not applicable; not required for post-closure care permit application
C.1.3.3	For Treatment Facilities	N			Not applicable; not required for post-closure care permit application
C.2	Waste Analysis Plan	N			Not applicable; not required for post-closure care permit application
C.2.1	Parameters and Rationale	N			Not applicable; not required for post-closure care permit application
C.2.1.1	Parameters	N			Not applicable; not required for post-closure care permit application
C.2.1.2	Rationale	N			Not applicable; not required for post-closure care permit application
C.2.1.3	Operational WAP Requirements	N			Not applicable; not required for post-closure care permit application
C.2.2	Test Methods	N			Not applicable; not required for post-closure care permit application

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
C.2.2.1	Identify Test Methods	N			Not applicable; not required for post-closure care permit application
C.2.2.2	Nonstandard Test Methods	N			Not applicable; not required for post-closure care permit application
C.2.3	Sampling Methods	N			Not applicable; not required for post-closure care permit application
C.2.3.1	Identify Sampling Devices and Methods	N			Not applicable; not required for post-closure care permit application
C.2.3.2	Nonstandard Devices or Methods	N			Not applicable; not required for post-closure care permit application
C.2.3.3	Sampling Strategies	N			Not applicable; not required for post-closure care permit application
C.2.3.4	Multi-phase Wastes	N			Not applicable; not required for post-closure care permit application
C.2.3.5	Safety	N			Not applicable; not required for post-closure care permit application
C.2.4	Frequency of Analyses	N			Not applicable; not required for post-closure care permit application
C.2.5	Add'l Req's for Waste Generated Off-site	N			Not applicable; not required for post-closure care permit application
C.2.5.1	Pre-acceptance Procedures	N			Not applicable; not required for post-closure care permit application
C.2.5.2	Waste Receipt Procedures	N			Not applicable; not required for post-closure care permit application
C.2.5.2.1	Representative Sampling	N			Not applicable; not required for post-closure care permit application

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
C.2.5.2.2	Inspection Procedures	N			Not applicable; not required for post-closure care permit application
C.2.5.2.3	Compressed Gas or Lab Pack Receipt Procedures	N			Not applicable; not required for post-closure care permit application
C.2.5.3	Waste Acceptance Criteria	N			Not applicable; not required for post-closure care permit application
C.2.5.3.1	Fingerprint or Gate Receipt Parameters	N			Not applicable; not required for post-closure care permit application
C.2.5.3.2	Triggers for Additional Analysis or Information	N			Not applicable; not required for post-closure care permit application
C.2.6	Add'l Req's for Ignitable, Reactive or Incompatible Wastes	N			Not applicable; not required for post-closure care permit application
C.2.6.1	Identification Methods	N			Not applicable; not required for post-closure care permit application
C.2.6.2	Compatibility Testing	N			Not applicable; not required for post-closure care permit application
C.2.7	Surface Impoundments Exempt from LDRs under 728.104(a)	N			Not applicable; not required for post-closure care permit application
C.2.7.1	Add'l Req's for Surface Impoundments Exempt from LDRs under 728.104(a)	N			Not applicable; not required for post-closure care permit application
C.2.7.1	Sampling	N			Not applicable; not required for post-closure care permit application

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
C.2.7.2	Analysis	N			Not applicable; not required for post-closure care permit application
C.2.7.3	Residual Management	N			Not applicable; not required for post-closure care permit application
C.3	Quality Assurance	N			Not applicable; not required for post-closure care permit application
C.3.1	QA/QC Procedures	N			Not applicable; not required for post-closure care permit application
C.3.2	Chain of Custody	N			Not applicable; not required for post-closure care permit application
D1	Containers	Y		Volume I; Section D	Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.1	Description of Containers	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.1.1	General Information on Container Types	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.1.2	Compatibility	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2	Container Management Practices	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.1	General Container Management	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.2	Movement of Containers	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.3	Arrangement	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D1.2.4	Stacked Containers	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.4.1	How Containers will be Stabilized	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.4.2	Ability to Support	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.4.3	Compliance with NFPA	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5	Ignitable, Reactive and Incompatible Wastes	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5.1	Compliance w/ 50 feet	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5.2	General Precautions for Ignitable and Reactive Wastes	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5.3	Separation of Incompatibles	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5.4	General Requirements for Incompatible Wastes	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5.5	Waste Specific Management Requirements	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.5.6	Documentation	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.2.6	Lab Packs	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D1.2.7	Compressed Gas Cylinders	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3	Secondary Containment System Design and Operation	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3.1	General Design	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3.2	Base or Liner Design and Condition	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3.3	Containment System Drainage	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3.4	Containment System Capacity	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3.5	Control of Precipitation	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.3.6	Removal of Liquids from Containment System	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.4	Containers w/o Free Liquids	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.4.1	Container Storage Area Drainage	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D1.4.2	Protection of Soil and Water	N			Not applicable; the facility does not have or plan to have any RCRA-permitted containers
D2	Tank Systems	Y		Volume I; Section D2	Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1	Description of Tanks	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.1.1	Summary Table	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1.2	Dimensions and Capacity of Each Tank	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1.3	Piping and Instrumentation Diagram (P&ID)	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1.4	Feed Systems, Safety Cutoff, Bypass Systems and Pressure Controls	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1.5	Tank History	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1.5.1	Internal Inspection Report	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.1.5.2	Results of Testing	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.2	Age of Tank System	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3	Assessment of Tank System's Integrity	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.1	Assessment of Existing Tank System's Integrity	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.1.1	Design Standards	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.1.2	Characteristics of the Waste	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.1.3	Corrosion Protection Measures	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.3.1.4	Documented Age of the Tank System	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.1.5	Results of Testing	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.1.6	Complying w/ 724.296	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2	Assessment of New Tank System's Integrity	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.1	Design Standards	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.2	Characteristics of the Waste	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.3	Results of Testing	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.4	Corrosion Assessment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.4.1	Factors Effecting Corrosion	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.4.2	Type and Degree of Corrosion Protection	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.5	Protection from Vehicular Traffic	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.3.2.6	Design Considerations	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.4	Installation of a New Tank System	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.4.1	Installation Report	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.4.1.1	Inspection Results	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.4.1.2	Proper Placement of Backfill	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.4.1.3	Tank Tightness	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.4.1.4	Protection Measures for Ancillary Equipment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.4.1.5	Certification of Corrosion Protection Measures	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.5	Secondary Containment and Detection of Releases	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.5.1	Documentation of Secondary Containment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.5.2	Qualifications for Exemption from Secondary Containment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6	Type of Secondary Containment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.1	Exemptions for Ancillary Equipment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.2	Design	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.3	Materials of Construction	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.6.4	Compatibility w & Impermeability to Wastes	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.5	Strength of Materials	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.6	Foundation Analysis	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.7	Leak Detection System	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.6.8	Removal of Wastes or Liquids	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7	Req's for External Liner, Vault, Double-Walled Tank or Equivalent Device	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D.2.7.1	External Liner Systems	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.1.1	Calculations of Volume	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.1.2	Control of Precipitation	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.1.3	Free of Cracks and Gaps	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.1.4	Cover of Soil	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D.2.7.2	Vault Systems	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.7.2.1	Calculations of Volume	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.2.2	Control of Precipitation	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.2.3	Protection Against Formation and Ignition of Vapors	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.2.4	Moisture Barrier	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.3	Double-Walled Tank Systems	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.3.1	Integral Structure	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.3.2	Protection from Corrosion	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.7.3.3	Leak Detection System	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.8	Requirements until Secondary Containment is Installed	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.8.1	Non-enterable Underground Tanks	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.8.2	All Other Tanks	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.8.2.1	Results of a Leak Test	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.8.2.2	Schedule & Procedure for Assessment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.8.3	Ancillary Equipment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.8.4	Leaking or Unfit Tanks	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.9	Adjusted Standard for Secondary Containment Requirements	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10	Tank Management Practices	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.1	Controls and practices to Prevent Spills and Overflows	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.1.1	Spill Prevention Controls	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.1.2	Overfill Prevention Controls	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.1.3	Calibration Schedule of Control Equipment	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.1.4	Freeboard	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.2	Tank Systems with Ignitable or Reactive Wastes	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D2.10.2.1	Precautions Taken to Prevent Ignition or Reaction	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.2.2	Storage Steps	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.2.3	Emergency Use Only	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.2.4	Compliance w/ NFPA	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.3	Tank Systems with Incompatible Wastes	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.3.1	Identify Tanks	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.3.2	Provide Operating Procedures	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.3.3	Precautions Taken to Prevent Reactions	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D2.10.4	Documentation	N			Not applicable; the facility does not have or plan to have any RCRA-permitted tanks
D10	Miscellaneous Units	Y		Volume I, Section D10	
D10.1	Description of Miscellaneous Units	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.1.1	Dimensions	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.1.2	Process Rate	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
D10.1.3	Design Standards	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.1.4	Safety Features	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.1.5	Description of Wastes	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.2	Assessment of the Unit	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.3	Secondary Containment	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.3.1	Units w Free Liquids	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.3.1.1	Calculations	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.3.1.2	Capacity	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.3.1.3	Prevention	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.3.2	Units w/o Free Liquids	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
D10.4	Assessment of the Operation	N			Not applicable; the facility does not have or plan to have any miscellaneous RCRA-permitted units
E	Groundwater Monitoring	Y		Volume I; Section E	
E.1	Exemption from Groundwater Protection Requirements	Y		Section E.1	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
E.1.1	Waste Piles	N			Not applicable; the facility is not requesting a waiver
E.1.2	Landfills	N			Not applicable; the facility is not requesting a waiver
E.1.3	No Migration	N			Not applicable; the facility is not requesting a waiver
E.2	Interim Status Groundwater Monitoring Data	Y		Section E.2	Information is found in the original approved RCRA Part B Permit Application
E.3	Historical Hydrogeological Summary	Y		Section E.3; Table E-2; Figures E-1 through E-3	
E.4	Topographic Map Requirements	Y		Section E.4; Table E-1; Figures B-1 through B-6 and B-9	
E.5	Contaminant Plume Description	Y		Section E.5	
E.6	Detection Monitoring Program	Y		Section E.6	
E.6.1	Constituents to be Monitored	Y		Section E.6.1; Table E-3; Section I.2.3; Table I-3; Appendix I.1.6-2	
E.6.2	General Monitoring Program Requirements	Y		Section E.6.2; Appendix E.6.2	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
E.6.3	Groundwater Monitoring System	Y		Section E.6.3; Appendix E.6.2; Appendix E.6.3; Figures E-4 through E-7; Tables E-4 and E-5; Section I.2.3; Appendix I.1.6-2	
E.6.4	Description of Sampling and Analysis Procedures	Y		Section E.6.4; Tables E-3, E-6, E-7, and E-8; Figures E-8 through E-10; Appendix E.6.3; Section I.2.3; Appendix I.1.6-2	
E.6.5	Evaluation of Groundwater Surface	Y		Section E.6.5; Appendix E.6.2; Section I.2.3; Appendix I.1.6-2	
E.6.6	Background Quality	Y		Section E.6.6; Table E-9; Appendix E.6.2; Section I.2.3; Table I-4; Appendix I.1.6-2	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
E.6.7	Statistical Evaluations	Y		Section E.6.7; Table E-9; Appendix E.6.2; Section I.2.3; Table I-4; Appendix I.1.6-2	
E.6.8	Statistically Significant Increases	Y		Section E.6.8	
E.7	Compliance Monitoring Program	Y		Section E.7	
E.7.1	Description of the Monitoring Program	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.1.1	Waste Description	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.1.2	Concentration Limits	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.1.3	Compliance Point	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.1.4	Compliance Period	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.2	Alternate Concentration Limits	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.2.1	Adverse Effects on Groundwater Quality	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.2.2	Potential Adverse Effects on Surface Water Quality	N			Not applicable; no hazardous constituents have been detected at the point of compliance

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
E.7.3	General Monitoring Program Requirements	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.4	Groundwater Monitoring System	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.5	Description of Sampling and Analysis Procedures	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.6	Background Quality	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.7	Statistical Evaluations	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.8	Evaluation of Groundwater Surface	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.9	Annual Appendix I	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.7.10	Statistically Significant Increases	N			Not applicable; no hazardous constituents have been detected at the point of compliance
E.8	Corrective Action Program	Y		Section E.8	
E.8.1	Description of Corrective Action Program	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.1.1	Characterization of Contaminated Groundwater	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.1.2	Concentration Limits	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.1.3	Compliance Point	N			Not applicable; hazardous constituents have not been detected in groundwater

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
E.8.1.4	Compliance Period	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.1.5	Construction Detail	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.1.6	Effectiveness of Corrective Action	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.2	Alternate Concentration Limits	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.2.1	Adverse Effects on Groundwater Quality	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.2.2	Potential Adverse Effects on Hydraulically-Connected Surface Water Quality	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.3	Corrective Action Plan	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4	Groundwater Monitoring Program	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.1	General Monitoring Program Requirements	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.2	Groundwater Monitoring System	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.3	Description of Sampling and Analysis Procedures	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.4	Background Quality	N			Not applicable; hazardous constituents have not been detected in groundwater

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
E.8.4.5	Statistical Evaluations	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.6	Evaluation of Groundwater Surface	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.7	Extension of Compliance Period	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.8	Effectiveness of Corrective Action	N			Not applicable; hazardous constituents have not been detected in groundwater
E.8.4.9	Evaluation of Corrective Action Program	N			Not applicable; hazardous constituents have not been detected in groundwater
E.9	Reporting Requirements	Y		Section E.9	
E.10	Description of Corrective Action for Solid Waste Management Units	Y		Section E.10; Appendix I.6; Appendix I.6-A; Section K.4.2.3	
F	Procedures to Prevent Hazards	Y		Volume II, Section F	
F.1	Security	Y		Section F.1; Appendix F; Figures B-2 through B-6 and B-10	
F.1.1	Waiver from the Security Requirements	N		Section F.1.1; Appendix F	
F.1.1.1	Physical Contact w / the Waste	N			Not applicable; the facility is not requesting a waiver from the security requirements

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
F.1.1.2	Disturbance of the Waste	N			Not applicable; the facility is not requesting a waiver from the security requirements
F.1.2	24-Hour Surveillance System	Y		Section F.1.2; Figures B-2 through B-6 and B-10	
F.1.3	Barrier and Controlled Entry	Y		Section F.1.3	
F.1.4	Warning Signs	Y		Section F.1.4; Appendix F	
F.2	Inspection Schedule	Y		Section F.2; Tables F-1 through F-3; Appendix F; Section I.2.2.3	
F.2.1	Inspection Log	Y		Section F.2.1; Appendix F.2.1; Appendix F; Section I.2.2.4	
F.2.1.1	Items Inspected	Y		Section F.2.1.1; Tables F-1 through F-3; Appendix F; Section I.2.2.1	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
F.2.1.2	Types of Problems	Y		Section F.2.1.2; Tables F-1 through F-3; Appendix F; Section I.2.2.2	
F.2.1.3	Inspection Frequency	Y		Section F.2.1.3; Tables F-1 through F-3; Appendix F; Section I.2.2.3	
F.2.2	Repair Log	Y		Section F.2.2; Appendix F; Section I.2.2.5; Appendix I.2.2.6	
F.2.2.1	Contents of Repair Log	Y		Section F.2.2.1; Appendix F; Section I.2.2.6	
F.2.2.2	Repair Times	Y		Section F.2.2.2; Section I.2.2.7	
F.2.3	Container & Container Storage Area Inspection	Y		Section F.2.3; Appendix F	
F.2.3.1	Inspection Frequency	N			Not applicable; the facility does not operate any RCRA-permitted container storage areas and containers in use are not used for greater than 90-day storage of hazardous wastes

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
F.2.3.2	Compressed Gas Cylinders	N			Not applicable; the facility does not operate any RCRA-permitted container storage areas and containers in use are not used for greater than 90-day storage of hazardous wastes
F.2.4	Tank System Inspection	Y		Section F.2.4; Appendix F	
F.2.4.1	Tanks	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.2	Ancillary Equipment	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.3	Shell Thickness	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.4	Internal Inspection	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.5	Cathodic Protection System	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.6	Tank Area	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.7	Overfilling Equipment	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.8	Monitoring Equipment	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.9	Uncovered Tanks	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems
F.2.4.10	Annual Integrity Inspection	N			Not applicable; the facility does not operate any RCRA-permitted tanks systems

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
F.3	Equipment Requirements	Y		Section F.3; Appendix F; Figures B-2 and B-3	
F.3.1	Waiver from the Equipment Requirements	N		Section F.3.1; Appendix F	
F.3.2	Internal Communication	Y		Section F.3.2	
F.3.3	External Communication	Y		Section F.3.3	
F.3.4	Water for Fire Control	Y		Section F.3.4; Appendix F.3.4; Appendix F	
F.3.5	Testing & Maintenance of Emergency Equipment	Y		Section F.3.5; Tables F-1 through F-3	
F.3.5.1	Equipment Testing	Y		Section F.3.5.1; Table F-2; Appendix F	
F.3.5.2	Maintenance/calibration Schedule	Y		Section F.3.5.2; Tables F-1 through F-3; Appendix F	
F.3.6	Aisle Space	Y		Section F.3.6; Figure E-3; Appendix F	
F.4	Preventive Procedures, Structures and Equipment	Y		Section F.4; Appendix F	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
F.4.1	Unloading Operations	Y		Section F.4.1; Appendix F	
F.4.1.1	Locations	N			Not applicable; once final closure is completed, loading or unloading of hazardous wastes will not occur at the LTF
F.4.1.2	Structures & Equipment	N			Not applicable; once final closure is completed, loading or unloading of hazardous wastes will not occur at the LTF
F.4.1.3	Procedures	N			Not applicable; once final closure is completed, loading or unloading of hazardous wastes will not occur at the LTF
F.4.2	Run-Off Control	Y		Section F.4.2; Appendix F; Section I.1.6; Section I.2.2.2; Section I.2.4.1; Section K.4.2.3	
F.4.3	Water Supplies	Y		Section F.4.3; Appendix F	
F.4.4	Equipment and Power Failure	Y		Section F.4.4; Appendix F	
F.4.5	Personal Protection Equipment	Y		Section F.4.5; Appendix F	
G.	Evaluation of Potential Hazards & Contingency Plan	Y		Volume II; Section G	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.1	Evaluation of Potential Hazards Report	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.1	Executive Summary	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.2	Facility Description	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.2.1	General Information	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.2.2	Surrounding Area	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.3	Chemical & Physical Properties of Wastes Managed at the Site	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.3.1	Waste Properties of Constituents in Wastes	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.3.2	Identify Products of Incomplete Combustion (PICs)	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.3.3	Appropriate Exposure Limit (AEL)	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.1.3.4	Ranking of AELs	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.4	Air Modeling	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.4.1	Air Model	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.4.2	Limitations	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.4.3	Justify Assumptions	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.4.4	Input Data	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5	Evaluation/Assessment Report	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.1	Scenarios	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.2	Wastes	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.1.5.3	Results & Evaluation	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.1	On-site & Off-site Effects	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.2	The Area Affected	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.3	The Maximum Extent	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.4	The Time to Reach Maximum Extent	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.5	Duration	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.6	Arrangements	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.1.5.3.7	Evacuation Requirements	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2	Contingency Plan	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.2.1	General Information	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.1	General Description of Site	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.2	Facility Drawing	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.3	Waste Types	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.4	Surrounding Land Use	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.5	Possible Hazards	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.6	Worst Case Scenario	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.1.7	Emergency Equipment	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.2	Emergency Coordinators	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.2.2.1	Identify Emergency Coordinators	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.2.2	Demonstrate Availability	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.2.3	Authority to Commit Resources	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.3	Assessment	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.3.1	Off-Site Impact	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.3.2	Evacuation Determination	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.4	Implementation	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.4.1	When	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.4.2	How	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.2.5	Emergency Response Procedures	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.5.1	Identification of Materials Released	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.5.2	Notification	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.5.2.1	Inform Employees	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.5.2.2	Notify local & State Agencies	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.5.2.3	Notification of Evacuation	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.5.2.4	Report Incident	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.6	Control Procedures	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.6.1	Prevention of Recurrence or Spread of Fires, Explosions or Releases	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.2.6.2	Monitoring	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.6.3	Containers	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.6.4	Tank Systems	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.6.4.1	Specify Procedures to Respond to Incident	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.6.4.2	Demonstrate that the Procedures meet 724.296	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.7	Evacuation Plan	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.7.1	Evacuation Signals	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.7.2	Evacuation Routes	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.8	Post-Emergency Actions	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.2.8.1	Storage and Treatment of Released Material	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.8.2	Management of Incompatible Materials	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.8.3	Post-Emergency Equipment Maintenance	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.9	Reporting Requirements	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.9.1	Post Emergency Response Actions	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.9.2	Note in the Operating Record	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.9.3	Written Report	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.10	Coordination Agreement Requirements	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.10.1	Documentation of Agreements & Arrangements	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
G.2.10.2	Coordination Agreements	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.10.3	Facility Operations	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.10.4	Familiarize Local Hospitals	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.10.5	Primary Response Authority	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
G.2.10.6	Primary Evacuation Authority	N			Not applicable; not required for post-closure care permit; additionally, the facility has a stand alone Contingency Plan
H	Personnel Training	Y		Volume II, Section H	
H.1	Training Program	Y		Section H.1	
H.1.1	Training Director	Y		Section H.1.1	
H.1.2	Job Title – Job Description	Y		Section H.1.2; Table H-1	
H.1.3	Relevance of Training to Job Position	Y		Section H.1.3	
H.1.4	Outline of Training Program	Y		Section H.1.4	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
H.1.4.1	Training Content, Frequency and Technique	Y		Section H.1.4.1	
H.1.4.2	Training for Emergency Response	Y		Section H.1.4.2	
H.2	Implementation of Introductory and Continuing Programs	Y		Section H.2	
H.2.1	Completion of Training	Y		Section H.2.1	
H.2.2	Record Keeping	Y		Section H.2.2; Appendix H.2.2	
I	Closure and Post- Closure Requirements	Y		Volume II, Section I	
I.1	Closure Plan	Y		Section I.1	
I.1.1	Closure Performance Standard	Y		Section I.1.1	
I.1.1.1	General Requirement	Y		Section I.1.1.1	
I.1.1.2	Specific Requirements	Y		Section I.1.1.2	
I.1.2	Maximum Operations and Waste Inventory	Y		Section I.1.2; Table I-1	
I.1.3	Partial Closure	Y		Section I.1.3	
I.1.4	Closure Methods	Y		Section I.4	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
I.1.5	Removal and Decontamination Procedures	Y		Section I.1.5; Appendix I.1.5	
I.1.6	Other Activities	Y		Section I.1.6; Appendix I.1.5; Appendix I.1.6-1; Appendix I.1.6-2; Section E.6	
I.1.7	Unit Specific Closure Activities	Y		Section I.1.7	
I.1.7.1	Closure of Container Storage Areas	N			Not applicable; there are no RCRA-regulated container storage areas present at the LTF
I.1.7.2	Closure of Tank Systems	N			Not applicable; there are no tank systems present at the LTF
I.1.8	Closure Schedule	Y		Section I.1.8; Table I-2	
I.1.9	Expected Year of Final Closure	Y		Section I.1.9	
I.1.10	Alternate Requirements	Y		Section I.1.10	
I.2	Post-Closure Plan	Y		Section I.2	
I.2.1	Identification of Units	Y		Section I.2.1	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
I.2.2	Post-Closure Inspection Plan	Y		Section F.2; Tables F-1 through F-3; Appendix F; Section I.2.2; Appendix I.2.2	
I.2.2.1	Items Inspected	Y		Section F.2.1.1; Tables F-1 through F-3; Appendix F; Section I.2.2.1	
I.2.2.2	Types of Problems	Y		Section F.2.1.2; Tables F-1 through F-3; Appendix F; Section I.2.2.2	
I.2.2.3	Inspection Frequency	Y		Section F.2.1.3; Tables F-1 through F-3; Appendix F; Section I.2.2.3	
I.2.2.4	Documentation of Inspection	Y		Section F.2.1; Appendix F.2.1; Appendix F; Section I.2.2.4 Appendix I.2.2.6	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
I.2.3	Post-Closure Monitoring Plan	Y		Section E.6; Section I.2.3; Table I-3 through Table I-8; Appendix I.1.5; Appendix I.1.6-1; Appendix I.1.6-2; Figures I.1 and I.2	
I.2.4	Post-Closure Maintenance Plan	Y		Section I.2.4;	
I.2.4.1	Procedures, Equipment & Material	Y		Section I.2.4.1	
I.2.4.2	Rationale	Y		Sections I.2.4.1 and I.2.4.2	
I.3	Survey Plat	Y		Section I.3	
I.3.1	Identify Units/Areas	Y		Section I.3.1	
I.3.2	Note on Plat	Y		Section I.3.2	
I.3.3	Certification of Plat	Y		Section I.3.3	
I.3.4	Recording of Survey Plat	Y		Section I.3.4	
I.3.5	Existing Facilities with Closed Disposal Units	Y		Section I.3.5	
I.4	Notice in Deed and Certification	Y		Section I.4	
I.4.1	Notice in Deed	Y		Section I.4.1	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
I.4.2	Certification of Notification	Y		Section I.4.2	
I.4.3	Existing Facilities with Closed Disposal Units	Y		Section I.4.3	
I.5	Closure Cost Estimate	Y		Section I.5; Table I-9	
I.5.1	Third Party Costs	Y		Section I.5.1	
I.5.2	Maximum Cost Estimate	Y		Section I.5.2; Table I-9	
I.5.3	Unit Costs	Y		Section I.5.3; Table I-9	
I.5.4	Annual Updates	Y		Section I.5.4	
I.6	Financial Assurance Mechanism for Closure	Y		Section I.6; Appendix I.6; Appendix I.6-A	
I.7	Post Closure Cost Estimate	Y		Section I.7; Table I-10	
I.7.1	Third Party Costs	Y		Section I.7.1	
I.7.2	Unit Costs	Y		Section I.7.2; Table I-10	
I.7.3	Annual Cost Estimate	Y		Section I.7.3; Table I-10	
I.7.4	Post-Closure Cost Estimate	Y		Section I.7.4; Table I-10	
I.7.5	Annual Updates	Y		Section I.7.5	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
I.8	Financial Assurance Mechanism for Post-Closure Care	Y		Section I.8; Appendix I.6; Appendix I.6-A	
I.9	Liability Requirements	Y		Section I.9; Appendix I.6; Appendix I.6-A	
I.9.1	Mechanism for Post-Closure Care	Y		Section I.9.1; Appendix I.6; Appendix I.6-A	
I.9.2	Request for Variance	Y		Section I.9.2	
I.10	State Mechanisms	Y		Section I.10	
J	Other Federal Laws	Y		Volume III; Section J	
K	Corrective Action	Y		Volume III; Section K	
K.1	Identification of SWMUs	Y		Section K.1; Section K.4.2.3	
K.2	Characterization of SWMUs	Y		Section K.2; Section K.4.2.3	
K.3	Characterization of Releases from SWMUs	Y		Section K.3; Section K.4.2.3	
K.4	Information Required for Renewal Applications	Y		Section K.4	
K.4.1	Information Required if USEPA Oversaw Initial CA Program	Y		Section K.4.1	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
K.4.1.1	Chronology of all CA related correspondence between USEPA & facility	N			Not applicable; corrective actions since issuance of the original permit have been conducted under the jurisdiction of the Illinois EPA
K.4.1.2	Copies of all letters received from USEPA regarding CA	N			Not applicable; corrective actions since issuance of the original permit have been conducted under the jurisdiction of the Illinois EPA
K.4.1.3	Copies of all letters regarding CA sent to USEPA	N			Not applicable; corrective actions since issuance of the original permit have been conducted under the jurisdiction of the Illinois EPA
K.4.1.4	Detailed discussion of each SWMU	N			Not applicable; corrective actions since issuance of the original permit have been conducted under the jurisdiction of the Illinois EPA
K.4.1.5	Information in Section E regarding any on-going groundwater monitoring/remediation	N			Not applicable; corrective actions since issuance of the original permit have been conducted under the jurisdiction of the Illinois EPA
K.4.2	Information Required if IEPA Oversaw Initial CA Program	Y		Section K.4.2	
K.4.2.1	Chronology of all corrective action efforts completed to date	Y		Section K.4.2.1; Table K-1	
K.4.2.2	Discussion of all CA related correspondence between IEPA and facility & copies of all correspondence	Y		Section K.4.2.2; Table K-2; Appendix K.4.2.2-1 and K.4.2.2-2	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
K.4.2.3	Detailed discussion of each SWMU	Y		Section K.4.2.3; Table K-3; Figure K-1	
K.4.2.4	Information in Section E regarding any on-going groundwater monitoring/remediation	Y		Section K.4.2.4; Section E	
AA	Air Emission Standards for Process Vents	Y		Volume III; Section AA	
AA.1	Identification of Units	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.2	Exemptions	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.2.1	Direct Measurement	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.2.2	Knowledge	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.2.3	Date of Determination	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.3	Identification of Process Vents	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.4	Standards for Process Vents	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.4.1	Compliance Standard	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
AA.4.2	Determining Compliance	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.4.2.1	Calculations	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.4.2.2	Performance Tests	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5	Standards for Closed Vents	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.1	Implementation Schedule	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.2	Documentation of Compliance	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.2.1	Resources	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.2.2	Records	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.2.3	Design Information	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.2.4	Certification of Operating Conditions	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.2.5	Certification of Efficiency	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3	Control Devices	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.1	Vapor Recovery	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
AA.5.3.2	Combustion Devices	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.3	Flare	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.4	Carbon Absorption (on-site regeneration)	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.5	Carbon Absorption (off-site regeneration)	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.6	Alternate Control Device	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.6.1	Documentation	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.3.6.2.	Test Data	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.4	Closed Vent Systems	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.4.1	Design	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.4.2	Operation	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.4.3	Monitoring and Testing	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.5.4.4	Control of Emissions	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6	Monitoring and Inspection of Control Devices	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
AA.6.1	Flow Indicator	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.1.1	Flow Rates	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.1.2	Location of Indicator	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.2	Continuous Monitor and Recorder	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.2.1	Parameters	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.2.2	Locations of Sensors	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.3	Specifications	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.4	Calibration and Maintenance	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.5	Inspection Schedule	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.6	Carbon Adsorption System (on-site regeneration)	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.7	Carbon Adsorption System (off-site regeneration)	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.7.1	Monitoring Schedule	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.7.2	Predetermined Time Interval	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
AA.6.8	Sampling and Monitoring	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.6.9	Alternate Parameter	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.7	Test Methods and Procedures for Closed Vent Systems	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.7.1	Instrument	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.7.2	Calibration Plan	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.7.3	Monitoring Plan	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.8	Performance Tests	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.8.1	Reference Methods	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.8.2	Operating Conditions	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.8.3	Data	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.8.4	Drawings	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA
AA.9	Recordkeeping and Reporting Requirements	N			Not applicable; process vents are not currently subject to 35 IAC 724, Subpart AA

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB	Air Emissions Standards for Equipment Leaks	Y		Volume III; Section BB	
BB.1	Determination of Applicability	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.1	Direct Measurement	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.2	Knowledge	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.2.1	Rate of Production Process	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.2.2	Documentation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.2.3	Prior Analysis Results	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.3	Samples	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.4	Vapor Pressure	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.1.5	Reanalysis	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.2	Exemptions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.2.1	Vacuum Service	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.2.2	300 Hours/Year	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3	Equipment Information	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1	Description of Equipment	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1.1	Equipment Identification	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1.2	Equipment Location	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1.3	Type of Equipment	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1.4	Percent Organics	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1.5	Waste State	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.3.1.6	Method of Compliance	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4	Pumps in Light Liquid Service	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1	Exemptions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.1	Dual Mechanical Seal System	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.1.1	Description	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.4.1.1.2	Barrier Fluid Analysis	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.1.3	Barrier Fluid Sensors	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.1.4	Inspections	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.1.5	Alarms	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.1.6	Response to Leaks	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.2	No Detectable Emissions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.2.1	Requirements of 724.964(g)(2)	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
B.4.1.2.2	Description of Pump	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.2.3	Operation of Pump	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.2.4	Instrumentation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.2.5	Test Results	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.1.3	Closed Vent System	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.2	Leak Detection Monitoring Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.4.2.1	Visual Inspection	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.2.2	Instrument	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.2.3	Calibration Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.2.4	Monitoring Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.3	Repair Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.4.4	Documentation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5	Compressors	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.1	Exceptions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.1.1	Closed Vent Systems	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.1.2	No Detectable Emissions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.1.2.1	Requirements of 724.964 (g)(2)	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.1.2.2	Description of Pump	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.1.2.3	Documentation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.5.2	Compressor Seal System Requirements	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.1	Description of System	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.2	Barrier Fluid Analysis	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.3	Barrier Fluid Operation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.4	Barrier System Sensors	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.5	Inspection of Sensors	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.6	System Failure	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.5.2.7	Repairs	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6	Pressure Relief Devices in Gas-Vapor Service	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.1	Exceptions to Standards	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.1.1	Closed Vent System	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.2	Pressure Relief Device	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.3	Leak Detection Monitoring Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.6.3.1	Instrument	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.3.2	Calibration Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.3.3	Monitoring Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.3.4	Background Level	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.3.5	Determining Compliance	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.6.3.6	Response to Release	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7	Sampling Connecting Systems	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.1	Exceptions to Sampling Connecting Standards	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.2	Sampling Connection Requirements	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.2.1	Return Purged Waste	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.2.2	Recycle Purged Waste	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.2.3	Control Device	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.3	Leak Detection Monitoring Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.7.3.1	Instrument	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.3.2	Calibration Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.7.3.3	Monitoring Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.8	Open-ended Valves or Lines	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.8.1	Requirements	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.8.1.1	Design	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.8.1.2	Operation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9	Valves in Gas-Vapor or Light Liquid Service	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.1	Leak Detection Monitoring Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.1.1	Instrument	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.1.2	Calibration Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.1.3	Monitoring Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.2	Repair Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.9.3	Exceptions to 724.957	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.1.1	Requirements	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.1.2	Descriptions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.1.3	Operation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.1.4	Instrument	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.1.5	Test Results	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.2	Unsafe to Monitor	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.2.1	Explanation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.2.2	Written Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.3	Difficult to Monitor	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.3.1	Justification	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.3.2	Documentation	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.9.3.3.3	Written Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
BB.10	Pumps, Valves, Pressure Relief Devices and other Connectors	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.10.1	Exceptions	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.10.2	Leak Detection Monitoring program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.10.2.1	Instrument	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.10.2.2	Calibration Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.10.2.3	Monitoring Plan	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
Bb.10.3	Repair Program	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.11	Delay of Repair	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.12	Skip Period	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.12.1	Election	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.12.2	Reduced Monitoring	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
BB.13	Recordkeeping Requirements	N			Not applicable; equipment at the facility are not currently subject to 35 IAC 724, Subpart BB
CC	Emission Standards	Y		Volume III; Section CC	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
CC.1	Exemptions from Subpart CC	Y		Section CC.1	
CC.2	Exemptions from 724.984 thru 724.987	Y		Section CC.2	
CC.3	Standards for Tanks	Y		Section CC.3	
CC.3.1	General Information	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.3.2	Level 1 Controls	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.3.2.1	Fixed Roof Design	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.3.2.2	Closure Devices	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.3.3	Level 2 Controls	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.3.3.1	Design	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.3.3.2	Closure Devices / Closed Vent Systems	N			Not applicable; there are currently no tanks at the facility applicable to 35 IAC 724 and 40 CFR 264 Subpart CC requirements
CC.4	Surface Impoundments	Y		Section CC.4	

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
CC.5	Containers	Y		Section CC.5; Figure B-3; Table CC-1	
CC.5.1	Level 1 Standards	Y		Section CC.5.1	
CC.5.1.1	Identify Type of Control	Y		Section CC.5.1.1	
CC.5.1.2	Covers / Closure Devices	Y		Section CC.5.1.2	
CC.5.2	Level 2 Standards	Y		Section CC.5.2	
CC.5.2.1	Identify Type of Control	Y		Section CC.5.2.1	
CC.5.2.2	Covers, Closure Device, Pressure Relief, Safety Devices	Y		Section CC.5.2.2	
CC.5.3	Level 3 Standards	Y		Section CC.5.3	
CC.5.3.1	Identify Type of Control	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.5.3.2	Design Information	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.5.3.3	Recordkeeping Procedures	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.6	Waste Transfer	Y		Section CC.6	
CC.7	Repairs	Y		Section CC.7	
CC.7.1	First Repair Attempt	N			Not applicable; the facility does not have any tanks or surface impoundments subject to 35 IAC 742 and 40 CFR 264 Subpart CC

	Section	Complete (Y/N)	Technically Adequate (Y/N)	Location	Comments
CC.7.2	Delay of Repairs	N			Not applicable; the facility does not have any tanks or surface impoundments subject to 35 IAC 742 and 40 CFR 264 Subpart CC
CC.8	Closed-vent Systems and Control Devices	Y		Section CC.8	
CC.8.1	Demonstration of Compliance	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.8.1.1	Meets the Requirements of 724.987(c)	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.8.1.2	Operates in Accordance w / 724.933(k)	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.8.1.3	In Compliance w / 724.987 (b)(3)	N			Not applicable; the facility does not have any containers that must meet Level 3 standards
CC.9	Inspection and Monitoring	Y		Section CC.9	
CC.9.1	Compliance w / 724.984 thru 724.987	Y		Section CC.9.1	
CC.9.2	Implement a Written Plan	Y		Section CC.9.2	
CC.10	Recordkeeping	Y		Section CC.10	
CC.11	Reporting Requirements	Y		Section CC.11	

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, INTRODUCTION**

Insert attached page 7 after page 6 in Introduction Section.

July 31, 2007, Modification—On July 31, 2007, the Refinery submitted to the Illinois EPA a response to Notices of Deficiency (NODs) identified by the Illinois EPA during their initial completeness review. The response was prepared so as to incorporate the requested information into the Renewal Application in the appropriate sections. Each modified page is indicated with a revision date of July 31, 2007.

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, INTRODUCTION**

**Remove Tables 2 and 3
and replace with attached Tables 2 and 3.**

Table 2. Outline of Volume II of the Renewal Application

Section	Title
SECTION F	PROCEDURES TO PREVENT HAZARDS
Appendix F.2.1	Typical Inspection Logs
Appendix F.3.4	Certification of Adequate Water Volume and Pressure
Appendix F	Version of Section F Available for Public Review
SECTION G	EVALUATION-ASSESSMENT OF POTENTIAL HAZARDS & CONTINGENCY PLAN
SECTION H	PERSONNEL TRAINING
Appendix H.2.2.2	Example Training Record
SECTION I	CLOSURE AND POST-CLOSURE REQUIREMENTS
Appendix I.1	CAMU Permit Modification Request
Appendix I.1.5	Soil-Core Sampling Standard Operating Procedures
Appendix I.1.6-1	Unsaturated Zone Monitoring Plan and Addendum
Appendix I.1.6-2	Groundwater Monitoring Plan and Addendum
Appendix I.2.2	Facility Inspection Form
Appendix I.2.2.6	Repair Log
Appendix I.6	Financial Assurance Documentation
Appendix I.6-A	Version of Appendix I.6 Available for Public Review

Table 3. Outline of Volume III of the Renewal Application

Section	Title
SECTION J	OTHER FEDERAL LAWS
SECTION K	CORRECTIVE ACTION
Appendix K.4.2.2-1	Chronological Summary of Correspondence Between IEPA and the Lemont Refinery
Appendix K.4.2.2-2	Chronological Copies of Letters and Permits Between the IEPA and the Lemont Refinery
SECTION AA	AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS
SECTION BB	AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS
SECTION CC	AIR EMISSION STANDARDS FOR PROCESS VENTS

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION A**

**Remove pages A-1 through A-8
and replace with the attached pages A-1 through A-8.**

A FORMS, CERTIFICATIONS, CONFIDENTIALITY, AND PUBLIC INVOLVEMENT

A.1 Forms and Permits

A.1.1 RCRA Part A Permit Application

The RCRA Part A Permit Application included in Appendix A.1.1 is complete and consistent with the Renewal Application and includes the contents specified in 35 IAC 703.181. The RCRA Part A Permit Application is signed by the Vice President and Plant Manager of the Lemont Refinery. The Vice President and Plant Manager of the Lemont Refinery has signatory authority as both the owner and operator of the facility in accordance with 35 IAC 702.126(a)(1)(A).

A.1.2 Permits or Construction Approvals

A list of all permits or construction approvals received or applied for under any of the following programs is included in Table A-1:

- RCRA.
- Underground Injection Control (UIC) program under the Safe Drinking Water Act (SDWA) and 35 IAC 704.
- National Pollutant Discharge Elimination System (NPDES) program under the federal Clean Water Act (CWA) and 35 IAC 309.
- Prevention of Significant Deterioration (PSD) program (addressed under the Refinery's Title V Permit Application).
- Title V permits under the Clean Air Act (CAA).
- Non-attainment program under the CAA.
- National Emission Standards for Hazardous Air Pollutants (NESHAPs) preconstruction approval under the CAA.
- Ocean dumping permits under the Marine Protection, Research, and Sanctuaries Act (MPRSA).
- Dredge or fill permits under Section 404 of the CWA.
- Other relevant environmental permits, including State of Illinois permits.

A.2 Certifications

A.2.1 Siting Certification

A siting certification is not included as part of the Renewal Application since the facility is neither a pollution-control facility nor a new facility as defined by Section 3.330 of the Illinois Compiled Statutes Environmental Safety Environmental Protection Act (the Act).

A.2.2 Facility Certification

This Renewal Application is accompanied by a Facility Certification letter in compliance with 35 IAC 702.126(d). The certification letter has been signed by the Vice President and Plant Manager of the Lemont Refinery and is included in Appendix A.2.2. The Vice President and Plant Manager of the Lemont Refinery has signatory authority as both the owner and operator of the Refinery in accordance with 35 IAC 702.126(a)(1)(A).

A.2.3 Technical Information Certification

When applicable, certain technical data, such as design drawings, specifications, and engineering studies, are certified (sealed) by a qualified Professional Engineer (P.E.) who is licensed to practice in the State of Illinois in accordance with Illinois Revised Statute (Ill. Rev. Stat.), Paragraph 5101, Section 1, and Paragraph 5119, Section 13.1.

Work required by this Renewal Application or corresponding regulations that fall within the scope and definitions of the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989 have been performed in compliance with these laws.

A.2.4 Prior Conduct Certification

A completed Prior Conduct Certification Evaluation for RCRA Hazardous Waste Facility Personnel (Illinois EPA Form LPC-372) signed by the Vice President and Plant Manager, as well as the Health, Safety, Security, and Environmental (HSS&E) Manager, of the Lemont Refinery is included in Appendix A.2.4, as required under Section 39(i) of the Act.

The delegation of signatory authority from the Owner to the Vice President and Plant Manager, the delegation of signatory authority from the Vice President and Plant Manager to the HSS&E Manager, and the applicable Prior Conduct Certification forms are also included in Appendix A.2.4.

The Refinery has requested that the Illinois EPA exempt the Prior Conduct Certification form containing the social security numbers from public disclosure per the requirements of 2 IAC 1828.202(a)(1)(B) and Section 7 of the Freedom of Information Act (FOIA) as discussed in Section A.3. Disclosure of this information (i.e., the social security numbers) would result in an “unwarranted invasion of personal privacy” if the information was available to be used by unauthorized parties to obtain personal information, up to and including identity theft. Sanitized versions of this form for public review are provided in Appendix A and will be present in the copies of the Renewal Application placed in the public repositories.

A.3 Public Disclosure Exemption Claims and Trade Secret Claims

To maintain the necessary heightened security at the Refinery and to minimize the possibility of the release of information that could facilitate terrorist attacks on the Refinery or its personnel, the Refinery has requested that certain parts of the Procedures to Prevent Hazards (Section F) be withheld from the public domain per 2 IAC 1828.401 and 35 IAC 130. In addition, the Refinery has requested that the Illinois EPA exempt the Prior Conduct Certification forms containing social security numbers from public disclosure per the requirements of 2 IAC 1828.202(a)(1)(B) and Section 7 of FOIA. Disclosure of this information (i.e., the social security numbers) would result in an “unwarranted invasion of personal privacy” if the information was available to be used by unauthorized parties to obtain personal information, up to and including identity theft. The Refinery is also requesting that sensitive financial information found in the Closure and Post-Closure Requirements (Section I) be withheld from the public domain per 2 IAC 1828.202(a)(1)(F). Sanitized versions of Section A and Section F for public review are provided as appendices to Section A and Section F, and will be present in the copies of the Renewal Application placed in the public repositories. A sanitized version of Appendix I.6 is provided as Appendix I.6-A, and will also be present in the public repositories’ copies of the Renewal Application.

A.3.1 Information Claimed Exempt from Public Disclosure

Due to the need for heightened security measures, the Refinery is claiming certain portions of the Procedures to Prevent Hazards (Section F) of the Renewal Application as exempt from public review per 2 IAC 1828.401. Dissemination of this sensitive security information might compromise security at the Refinery and could be used to facilitate an attack against the Refinery or its personnel.

In addition, the Refinery is claiming a portion of the Prior Conduct Certification forms (i.e., the social security numbers) as exempt from public review per the requirements of 2 IAC 1828.202(a)(1)(B) and Section 7 of FOIA. Disclosure of this

information (i.e., the social security numbers) would result in an “unwarranted invasion of personal privacy” if the information was available to be used by unauthorized parties to obtain personal information, up to and including identity theft.

The Refinery is also claiming Appendix I.6 as exempt from public review per the requirements of 2 IAC 1828.202(a)(1)(F). The information contained in Appendix I.6 is sensitive financial information and may cause competitive harm.

A.3.2 Trade Secrets Claims

The Refinery is not claiming any parts of the Renewal Application as exempt on the basis that the information constitutes trade secrets per 35 IAC 130.

A.3.3 Exempt or Exempt-In-Part Data Claims

Per 2 IAC 1828.401(a)(1)(F), the Refinery is claiming certain parts of the Procedures to Prevent Hazards (Section F) of the Renewal Application as exempt from public review to prevent the dissemination of sensitive security information that could be used to facilitate an attack against the Refinery or its personnel. In addition, the Refinery is claiming a portion of the Prior Conduct Certification forms (i.e., the social security numbers) as exempt from public review per the requirements of 2 IAC 1828.202(a)(1)(B) and Section 7 of FOIA. Disclosure of this information (i.e., the social security numbers) would result in an “unwarranted invasion of personal privacy” if the information was available to be used by unauthorized parties to obtain personal information, up to and including identity theft.

Per 2 IAC 1828.202(a)(1)(F), the Refinery is claiming certain parts of the Closure and Post-Closure Requirements (Section I) of the Renewal Application as exempt from public review to prevent the dissemination of sensitive financial information.

A claim and justification letter for this exemption is provided in Appendix A.3.3. The Refinery has submitted a copy of the Renewal Application marked in accordance with 2 IAC 1828.401(c) to the Illinois EPA and has provided a “sanitized” version of the Renewal Application to the Illinois EPA and the public repositories.

A.3.4 Justification Letter

A claim and justification letter for exempting parts of the Renewal Application from public disclosure is provided in Appendix A.3.3.

A.3.5 Privileged Information

The Refinery is not claiming any parts of the Renewal Application as exempt on the basis that the information is privileged per 2 IAC 1828.401.

A.4 Public Participation

The Refinery will make available all documents submitted to the Agency in furtherance of this Renewal Application to the public for inspection at the Lemont Public Library District and Lemont Village Hall.

A.4.1 Facility Mailing List and Information Repositories

The following subsections present the public participation requirements that apply to all permit applications.

A.4.1.1 Facility Mailing List

Dated hard (paper) and electronic copies of the Facility Mailing List are included in Appendix A.4.1.1. The electronic copy is provided in Microsoft® Word (2000) format. This mailing list will be periodically updated and resubmitted to the Illinois EPA as needed to include individuals who have interacted with the Refinery, such as those attending public meetings and respondents to mailings, as well as whenever a permit modification is requested.

A.4.1.2 Identification of Repositories

Documents submitted to the Illinois EPA in furtherance of the Renewal Application will be made available to the public at the Lemont Village Hall and the Lemont Public Library District. Information submitted to the Agency, including the Renewal Application, is provided to the repositories no later than the submittal date to the Agency. Documents may be copied upon payment of the actual cost of reproduction during the regular business hours of the repository. Specific repository location information is as follows:

Lemont Village Hall
418 Main Street, Lemont, Illinois 60439
Contact Person: Rose Yates
(630) 257-1550
Business Hours: M-F: 8:30am-5pm

Lemont Public Library District
50 E. Wend Street, Lemont, Illinois, 60439
Contact Person: Debbie Somchay
(630) 257-6541
Business Hours: M-Th: 9am-9pm; Fri: 9am-6pm; Sat: 9am-5pm;
Sun: 1pm-6pm

A list of documents provided at each of the repositories is provided in Tables A-2 and A-3 of the Renewal Application. These lists will be updated as needed.

A.4.1.3 Contents of Repository, Public Notice of Repository Availability

The Lemont Public Library District repository contents include the documents identified in Table A-2. Note that upon approval of the Renewal Application, the copies of the Refinery's Approved RCRA Part B Permit Application and the associated permit modifications will be removed from the public library. The Lemont Village Hall was not used as a repository prior to submittal of this Renewal Application; therefore, documents submitted to the Illinois EPA prior to April 23, 2007 are not available at the Lemont Village Hall. A list of documents available at the Lemont Village Hall is provided in Table A-3. The Refinery recognizes the requirement to maintain and update the repository throughout the application process, including verifying the contents of the repository and updating the Renewal Application information as new information is developed and submitted to the Agency. Each new repository submission is documented by referencing it in the letter by which that same information is submitted to the Agency. Note that the Refinery will not provide to the public repositories those sections of the Renewal Application that are exempted from public disclosure as discussed in Section A.3 of the Renewal Application.

The Refinery's notice of the repositories' availability for public review will include all of the following information:

- The name and address or map of the facility and the hazardous waste management operations or proposed operations addressed in the Renewal Application documents.
- A statement that hazardous waste permit application (i.e., Renewal Application) materials have been prepared and are available for community members to review and photocopy at the repository.
- The location and business hours of the repository.
- A statement that the Refinery will update the repository materials during the Illinois EPA's review of the Renewal Application.
- The name, address, and telephone number of the Refinery's contact person who will address questions regarding the Renewal Application documents and/or add interested parties to the facility's mailing list for future permit activities.
- A statement as follows: "For general information on the hazardous waste management permit program in Illinois, please contact Mr. Rob Watson, Environmental Protection Engineer, Illinois Environmental Protection

Agency, Bureau of Land, Permit Section, 1021 North Grand Avenue East,
Springfield, Illinois, 62794.”

A.4.1.4 Documentation of Public Notices of Repositories

The Refinery provided documentation that the public notices of the repositories were completed within 7 days of submittal as required by the regulations. Specifically, the Refinery provided the following information to the Agency in May 2007:

- A copy of the letter sent to individuals on the approved facility mailing list
- The date the letter was sent and the revision date of the mailing list used for the mailings.
- Either the publisher’s certification stating that (1) the public notice was published as a display advertisement once per week for three consecutive weeks, or (2) newspaper tear sheets containing the display advertisement for each date on which the ad(s) was(were) published.

A copy of the public notice of repository availability for the Renewal Application is provided in Appendix A.4.1.4. Documentation that the public notice was published in the local newspaper was provided to the Illinois EPA within 30 days of submittal of the Renewal Application.

A.4.2 Notification of Permit Application Submittal

The Refinery will provide notification of the Renewal Application’s submittal to all parties listed in the mailing list provided in Appendix A.4.1.1. Notification of the Permit Application’s submittal was combined with the notice of repository availability. A copy of the public notice letter is provided in Appendix A.4.1.4.

A.4.2.1 Content of Permit Application Notice

The Refinery’s notice of the Renewal Application’s submittal includes the following information:

- A statement that a hazardous waste management permit application (i.e., Renewal Application) was submitted to the Illinois EPA.
- The date on which the Renewal Application was submitted.
- A brief description of the facility and proposed operations, including the address or a map (e.g., a sketched or photocopied street map) of the facility’s location on the front page of the notice.

- The locations at which the Refinery has established an information repository where copies of the Renewal Application and any supporting documents can be viewed and photocopied.
- The name, telephone number, and address of the Refinery's contact person to whom interested parties can address questions and/or requests to be placed on the facility's mailing list.
- The mailing address of the RCRA Environmental Protection Engineer in the Illinois EPA's Bureau of Land to whom information, inquiries, and opinions may be directed throughout the review process.
- The name and telephone number of the appropriate Illinois EPA regional office.

A copy of the Permit Renewal Application notice is provided in Appendix A.4.1.4.

A.4.2.2 Documentation of Permit Application Notice

On May 23, 2007, the Refinery provided to the Agency documentation that notice of the Permit Renewal Application's submittal was provided to units of local government that have jurisdiction over the area in which the facility is located as well as to each state agency that has any authority under Illinois law with respect to the construction or operation of the facility. This was accomplished by providing to the Agency one copy of the letter sent to each local and state agency and a list of the contact names, agency names, and addresses of the agencies that received the notice.

A.4.2.3 New Combustion Units

The Refinery is not applying for new boilers and industrial furnaces (BIFs) or new incinerators. Therefore, this section of the Illinois EPA's 2006 Decision Guide is not applicable to the Refinery.

A.4.3 Pre-application Meeting

Per 35 IAC 703.191(a), a pre-application meeting is not required for applications for conducting post-closure and/or corrective action at a facility. As this Renewal Application is for post-closure care, a pre-application meeting is not required and this section of the 2006 Decision Guide is, therefore, not applicable to the Refinery.

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION A**

**Remove Tables A-2 through A-3
and replace with the attached Tables A-2 through A-3.**

**Table A-2. Permit Application Documents at the
Lemont Public Library District**

Document/Information	Date Submitted
RCRA Permit Application for the Lemont Refinery, Lemont, Illinois (including Permit Modifications) ¹	February 29, 1996 November 21, 1997 January 5, 1998 June 5, 1998
CAMU Application	December 1997
Group 1 Phase I/II RFI Work Plan	January 1998
Sewer Inspection & Maintenance Plan	May 1998
RCRA Part B Permit Renewal Application	April 23, 2007
RCRA Part B Permit Renewal Application Response to Notice of Deficiencies	July 31, 2007

¹ Upon approval of the Renewal Application, the Approved Part B Permit Application and the associated permit modification requests will be removed from the public library.

Acronyms


RCRA = Resource and Conservation Recovery Act
CAMU = Corrective Action Management Unit
RFI = RCRA Facility Investigation

Table A-3. Permit Application Documents at the Lemont Village Hall

Document/Information	Date Submitted
RCRA Part B Permit Renewal Application	April 23, 2007
RCRA Part B Permit Renewal Application Response to Notice of Deficiencies	July 31, 2007

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION A, APPENDIX A.1.1**

**Remove RCRA Subtitle C Site Identification Form
and replace with attached RCRA Subtitle C Site Identification Form.**

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal (See instructions on page 13.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # <u>Renewal</u>) <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (page 14)	EPA ID Number I L D 0 4 1 5 5 0 5 6 7		
3. Site Name (page 14)	Name: The Lemont Refinery, CITGO Petroleum Corporation, Lemont, IL		
4. Site Location Information (page 14)	Street Address: 135th Street & New Avenue		
	City, Town, or Village: Lemont	State: IL	
	County Name: Will	Zip Code: 60439-3659	
5. Site Land Type (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)	A. 3 2 4 1 1 0	B. _____	
	C. _____	D. _____	
7. Site Mailing Address (page 15)	Street or P. O. Box: Same as Item 4		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	
8. Site Contact Person (page 15)	First Name: Claude	MI:	Last Name: Harmon
	Phone Number: (630) 257-4450 Extension:		Email address: CHarmol@Citgo.com
9. Operator and Legal Owner of the Site (pages 15 and 16)	A. Name of Site's Operator: CITGO Petroleum Corporation		Date Became Operator (mm/dd/yyyy): 05/01/1997
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: PDV Midwest Refining LLC		Date Became Owner (mm/dd/yyyy): 05/01/1997
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

9. Legal Owner (Continued) Address	Street or P. O. Box: Same as Item 4 City, Town, or Village: State: Country: Zip Code:
---	--

10. Type of Regulated Waste Activity
 Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities
 Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste
 If "Yes", choose only one of the following - a, b, or c.

☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous Waste

Y ☐ N ☒ e. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☒ 2. Transporter of Hazardous Waste

Y ☒ N ☐ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.

Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your site)

Y ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace
 If "Yes", mark each that applies.
☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining

Y ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☒ N ☐ 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste that apply:

	<u>Manage</u>
a. Batteries	<input checked="" type="checkbox"/>
b. Pesticides	<input type="checkbox"/>
c. Mercury containing equipment	<input type="checkbox"/>
d. Lamps	<input checked="" type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste
 Note: A hazardous waste permit may be required for this activity.


C. Used Oil Activities
 Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter
 If "Yes", mark each that applies.
☐ a. Transporter
☐ b. Transfer Facility

Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner
 If "Yes", mark each that applies.
☐ a. Processor
☐ b. Re-refiner

Y ☐ N ☒ 3. Off-Specification Used Oil Burner

Y ☐ N ☒ 4. Used Oil Fuel Marketer
 If "Yes", mark each that applies.
☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 21.)						
A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.						
D001	D002	D003	D004	D006	D007	D008
D009	D010	D018	D035	D039	D043	F002
F037	F038	K050	K052	K169	K170	K171
B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.						
12. Comments (See instructions on page 21.)						
13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)						
Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)					Date Signed (mm/dd/yyyy)
	Robert E. Kent, Vice President and Plant Manager					07/30/2007

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION A, APPENDIX A.2.2**

**Remove Facility Certification
and replace with attached Facility Certification.**

FACILITY CERTIFICATION

I, Robert E. Kent, Vice President and Plant Manager, The Lemont Refinery, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Bob Kent

Robert E. Kent
Vice President and Plant Manager
The Lemont Refinery
CITGO Petroleum Corporation

Date: 7/30/07

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION A, APPENDIX A.2.4**

Remove divider sheet titled *Delegation of Signatory Authority* and replace with attached divider sheet titled *Delegation of Signatory Authority from Owner to Vice President and Plant Manager*, letter, and attached divider sheet titled *Delegation of Signatory Authority from Vice President and Plant Manager to Health, Safety, Security, and Environmental Manager*.


**DELEGATION OF SIGNATORY AUTHORITY FROM
OWNER TO VICE PRESIDENT AND PLANT MANAGER**

PDV MIDWEST REFINING LLC
LEMONT REFINERY
DELEGATION OF AUTHORITY

I, Stephen J. Bednar, the Assistant Secretary of PDV Midwest Refining LLC ("PDV Midwest"), a corporation duly organized and existing under the laws of the State of Delaware, United States of America, do hereby authorize the Plant Manager and the Operations Manager, whom have overall responsibility over the operation of PDV Midwest's Lemont Refinery, to sign or execute any permit, license application, amendment or report related to environmental matters, file such documents with the Illinois Environmental Protection Agency or the United States Environmental Protection Agency, and to take any other necessary action as my duly authorized representatives.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of this corporate this 20 day of July 2007.

[SEAL]


Stephen J. Bednar

State of Texas }
County of Harris } SS

Before me, the undersigned, a Notary Public, in and for said County and State, on this the 20 day of July, 2007, personally appeared Stephen J. Bednar, to me known to be the identical person who subscribed the name of the maker thereof to the foregoing instrument as the Assistant Secretary of PDV Midwest Refining LLC and acknowledged to me that he executed same as his free and voluntary act and deed and as the free and voluntary act and deed of such general partnership, for the uses and purposes therein set forth.

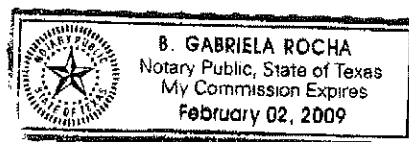
Given under my hand and seal of office the day and year last above written.

[SEAL]


Notary Public

My Commission Expires:

2-2-2009



**DELEGATION OF SIGNATORY AUTHORITY FROM VICE
PRESIDENT AND PLANT MANAGER TO HEALTH,
SAFETY, SECURITY, AND ENVIRONMENTAL MANAGER**

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION A, APPENDIX A.3.3**

**Remove Claim and Justification Letter for Exempt Data Claims
and replace with the attached Claim and Justification Letter for Exempt Data
Claims.**



CITGO Petroleum Corporation

135th Street & New Avenue
Lemont, IL 60439-3659

July 31, 2007

Mr. Steve Nightingale, P.E., Manager
Illinois Environmental Protection Agency
Bureau of Land, Permit Section
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276

**1978030004 – Will County
Lemont/CITGO Petroleum Corporation
ILD041550567**

**Justification and Claim for Exemption from Disclosure of Portions of the
RCRA Part B Permit Renewal Application**

Dear Mr. Nightingale:

CITGO Petroleum Corporation's (CITGO) Lemont, Illinois, Lemont Refinery (the Refinery) is currently preparing its Resource Conservation and Recovery Act (RCRA) Part B Permit Renewal Application (the Renewal Application) for submittal to the Illinois Environmental Protection Agency (Illinois EPA). During its preparation, the Refinery has determined that certain portions of the Renewal Application should be considered non-discloseable to the general public due to security and privacy concerns. Specifically, portions of Sections F (Procedures to Prevent Hazards) could disclose sensitive security information. In addition, disclosure of the Prior Conduct Certification Evaluation form (Illinois EPA Form LPC-372) required in Section A of the Renewal Application could result in the invasion of personal privacy (e.g., identity theft) due to the inclusion of the applicant's social security number (SSN). The Financial Assurance Information required in Section I of the Renewal Application may cause competitive harm.

In light of current world events and the overall need for heightened security, the Refinery is claiming that the portions of the Renewal Application discussed below be considered exempt from public disclosure per 2 Illinois Administrative Code (IAC) 1828.202. Specifically, 2 IAC 1828.202(a)(1)(F) provides exemption from public disclosure for:

"Trade secrets and commercial or financial information obtained from a person or business where the trade secrets or information are proprietary, privileged or confidential, or where disclosure of the trade secrets or information may cause competitive harm, including all information determined to be confidential under Section 4002 of the Technology Advancement and Development Act. Nothing contained in this subsection shall be construed to prevent a person or business from consenting to disclosure."

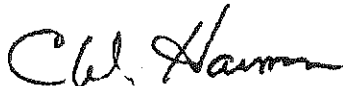
The Refinery's Renewal Application is normally considered to be part of the public record. In addition to the copies maintained by the Illinois EPA and at the Refinery, copies will be placed and maintained in two public repositories—the Lemont Public Library and the Lemont Village Hall. Disclosure of the Refinery's site security could impact both the Refinery and surrounding community.

The issue of nondisclosure of information that would result in an unwarranted invasion of personal privacy is addressed in 2 IAC 1828.202(a)(1)(B). The incidence of personal information and/or identity theft has significantly increased as more information is available in the public domain. The Refinery believes that inclusion of the applicant's SSN could result in an invasion of personal privacy through unauthorized use of the SSN by others. Such use could result not only in adverse consequences to the applicant (e.g., loss of personal funds, the misuse of medical information, etc.), but to the Refinery if the applicant's identity is stolen (e.g., including but not limited to impacts to the implementation of emergency response plans).

The issue of nondisclosure of confidential financial information is addressed in 2 IAC 1828.202(a)(1)(F). The confidential financial information included in Appendix I-6 may cause competitive harm. Therefore the Refinery requests that this information be maintained as confidential.

If you have any questions or if you need further information, please do not hesitate to contact me at (603) 257-4450.

Sincerely,



C. W. Harmon, Manager
Health, Safety, Security & Environmental

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION B**

**Remove pages B-1 through B-5
and replace with the attached pages B-1 through B-5.**

B FACILITY DESCRIPTION

B.1 General Description

B.1.1 Operation of Facility

The Lemont Refinery is a 160,000 barrel-per-day petroleum refinery located on approximately 900 acres in Will County, Illinois near the cities of Lemont and Romeoville. The Refinery's major products include gasoline, diesel fuels, aviation turbine fuels, petroleum coke, petrochemical solvents, and liquefied petroleum gas.

In 1973, the Refinery began land treating Refinery wastes in a small land treatment area. In 1980, three additional land treatment areas were added for a total land treatment facility (LTF) area of 13.5 acres. A single hazardous waste (American Petroleum Institute [API] separator sludge – Environmental Protection Agency [EPA] waste code K051) and other non-hazardous wastes were applied to the LTF until September 1981. Non-hazardous wastes were applied to the LTF between 1981 and 1989. The LTF was not used again until 1995 when non-hazardous wastes were applied. Since 1995, the LTF has been inactive.

In its entirety, the LTF area consists of approximately 28 acres which includes the four land treatment areas, adjacent roadways, three former decant basins, and untilled buffer zones around each land treatment plot. API separator sludge (K051) comprised less than 1% (by weight) of the total waste applied to the LTF. Non-hazardous wastes applied to the LTF include clear well sludge, cooling tower sludge, heavy oil sludge, stormwater basin dredgings, and water/wastewater sludge. The majority of wastes applied to the LTF were stormwater basin dredgings and water/wastewater treatment sludge. This RCRA Part B Permit Application is for closure and post-closure care at the LTF.

B.1.2 Process Flow Diagram

Currently, the LTF is not used to manage wastes and wastes have not been applied to the LTF since 1995. No other RCRA permitted units exist at the Lemont Refinery. This RCRA Part B Permit Application is solely for post-closure care at the LTF. Wastes currently generated at the Refinery are managed through the less-than-ninety-day storage area as applicable.

A Class 3 modification request to operate the LTF as a Corrective Action Management Unit (CAMU) was submitted in December 1997. Illinois EPA review of this modification is pending at this time. If approved, the CAMU would treat waste from the corrective action management program only. A process flow diagram was included in the CAMU application (December 1997).

No further application of Refinery waste is expected for the LTF. Wastes that are generated at the Refinery are shipped to appropriately licensed off-site treatment and/or disposal facilities. Therefore, a process flow diagram is not applicable.

B.1.3 Units

The Refinery currently manages hazardous and non-hazardous solid wastes in five types of units: (1) RCRA-permitted units such as the LTF; (2) satellite accumulation areas; (3) less-than-90-day storage areas; (4) solid waste storage areas (SWMUs) that are part of the Refinery's RCRA corrective action program; and (5) non-hazardous waste storage areas. Table B-1 lists the units present at the Refinery and provides a brief description of each unit, wastes managed in the unit, the size or capacity of the unit, the regulatory program under which each unit is managed, and the activity status (e.g., active, inactive, or closed) of each unit. The locations of the units at the Refinery are provided in Figures B-2 through B-6 (a key map is provided as Figure B-8).

The Lemont Refinery manages (or has managed) hazardous and/or non-hazardous solid wastes in the following types of units:

- Container Storage Areas.
- Landfarm.
- Surface Impoundment.
- Underground Storage Tanks.
- Waste Piles.
- Recycling Operations.
- Waste Treatment.
- Wastewater Treatment Unit.

As noted in Table B-1, the Illinois EPA approved closure of the hazardous waste disposal unit identified as SWMU 15C (SO4) in September of 2002.

B.2 Topographic Map

Topographic maps that meet the Illinois EPA's requirements as set forth in the 2006 Decision Guide are provided in the following subsections.

B.2.1 General Map Requirements

General map requirements as specified in the 2006 Decision Guide are addressed in the following sections.

B.2.1.1 Facility + One Mile

A topographic map of the Refinery that depicts the boundaries of the Refinery, extends at least one mile beyond the property boundaries, and shows the locations of on-site and off-site water wells is presented in Figure B-1. The legal boundaries of property owned by the Refinery are discussed in Section B.2.3.

B.2.1.2 Facility + 1,000 Feet

The information requested in Section B.2.1.2 of the Illinois EPA's 2006 Decision Guide and as required by 35 IAC 703.183(s) is provided in Figures B-2 through B-6. Table B-2 presents the figures corresponding to the information required by the 2006 Decision Guide.

Figures B-2 through B-6 include topographic contours digitized from data collected by the Lemont Refinery. This data set does not include information for areas west and north of the Chicago Sanitary and Ship Canal as well as some areas outside the south and southeast portions of the Refinery's property line but within the 1000-foot zone. Therefore, the topographic contours depicted for areas west and north of the Chicago Sanitary and Ship Canal in Figures B-2 through B-6 are from a United States Geological Survey (USGS) 7.5 minute-series topographic map (Romeoville, Illinois, 1993). USGS contours are not used to depict elevations over the entire site because the data are incomplete (i.e., contours stop at dikes, berms, etc.). The existing set of USGS contours for the area is presented in Figure B-9. Additionally, access points are depicted on Figures B-2 through B-6 and a figure containing more detailed descriptions of these access points is included as Figure B-10.

Injection wells are not included in the figures since they are not present either on-site or within 1000 feet of the Lemont Refinery's property line.

New (proposed) hazardous waste units are not depicted on figures since there are no new or proposed hazardous waste units at the Lemont Refinery.

B.2.2 Additional Map Requirements for New Land Disposal Facilities

The Refinery is not planning any new land disposal facilities; therefore, the additional map requirements for new land disposal facilities are not applicable to the Refinery, and no compliance demonstration is required.

B.2.3 Legal Description

Legal descriptions of parcels of land owned by the Refinery are provided in Appendix B.2.3.

B.3 Location Standards

In accordance with 35 IAC 703.184 and 724.118, location standards information is provided in the following subsections.

B.3.1 Seismic Standard

No portion of the State of Illinois is listed in 40 Code of Federal Regulations (CFR) Part 264, Appendix VI, incorporated by reference in 35 IAC 720.111(b); therefore, per 35 IAC 724.118(a), the Refinery is in compliance with the seismic standards. This section of the 2006 Decision Guide is therefore not applicable to the Refinery and no compliance demonstration is required.

B.3.2 Floodplain Standard

A copy of the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map (FIRM) for Will County, Illinois, is presented in Figure B-7. While portions of the Refinery are located in the 100-year floodplain, no part of the LTF is located within the 100-year floodplain.

B.3.3 Facilities in the 100-Year Floodplain

No part of the LTF is located within the 100-year floodplain, as shown in the FEMA FIRM for Will County, Illinois, presented in Figure B-7. Therefore, the engineering analysis, structural or engineering study, and procedures to remove waste specified in Sections B.3.3.1, B.3.3.2, and B.3.3.3 of the 2006 Decision Guide for facilities within the 100-year floodplain are not provided.

B.3.4 Existing Facilities not in Compliance with 35 IAC 724.118(b)

A copy of the FEMA FIRM for Will County, Illinois, is presented in Figure B-7. No part of the LTF is located within the 100-year floodplain; therefore, 35 IAC 724.118(b) is not applicable to the Refinery and no compliance demonstration is required.

B.4 Traffic Information

This RCRA Part B Permit Application is for post-closure care; therefore, a full discussion of traffic information related to the Refinery in compliance with 35 IAC 703.183(j) is not required to be included in this Renewal Application per 35 IAC 703.214. However, the following paragraphs provide a description of traffic issues related to post-closure care of the LTF.

Traffic associated with the LTF is expected to be minimal. Traffic during the post-closure care period will consist mainly of (1) light-weight vehicles associated with LTF inspection, maintenance, and monitoring, and (2) routine security patrol vehicles.

Access to the LTF is gained via a road through the Tank Farm comprised of gravel. This road meets the State of Illinois regulations and is rated for a maximum truck weight of 18,000 pounds per axle. The road leading to the LTF has a locked gate at the entrance. A security fence surrounds the entire perimeter of the LTF. Vehicles driven by Refinery personnel, security personnel, and contractors involved in maintenance or monitoring activities are the only authorized traffic in the LTF area.

B.5 Operating Record

B.5.1 Contents of Operating Record

This RCRA Part B Permit Application is for post-closure care. Currently, the LTF is not used to manage wastes and wastes have not been applied to the LTF since 1995. In accordance with 35 IAC 724.173, a written operating record of RCRA-related activities was maintained by the Refinery and is available upon request.

B.5.2 Installation of Tanks

RCRA tanks are not present at the Refinery. This section of the 2006 Decision Guide is therefore not applicable to the Refinery, and no compliance demonstration is required.

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION B**

**Remove Tables B-2 through B-3
and replace with the attached Tables B-2 through B-3.**

Table B-2. Facility Map Requirements Cross-Reference Table

Requested Information	Primary Figure in Which Information is Provided ^{1,2}
Map Orientation (North Arrow)	B-1 through B-7
Map Date	B-1 through B-7
Scale	B-1 through B-7
Legal Boundaries	B-1 through B-6
Surrounding Land Uses	B-2 through B-6
Access Controls	B-2 through B-6
Buildings and Structures	B-2 through B-6
Sewers: Process	B-2 through B-6
Sewers: Storm	B-2 through B-6
Storm Drains	B-2 through B-6
Loading and Unloading Areas	B-3
Fire Control Facilities	B-2 and B-3
Contours Sufficient to Show Surface Water Flow Around Facility Unit Operations	B-1 through B-6
100-Year Floodplain Area	B-2, B-3, and B-7
Surface Water, Including Intermittent Streams	B-2 through B-5
Flood Control or Drainage Barriers and Run-off Control Systems (Ditches)	B-2 through B-6
Wind Rose	B-2 through B-6
Injection Wells (On-Site and Off-Site) ³	Injection wells are not located on or within 1000 feet of the Lemont Refinery's property line.
Withdrawal Wells (On-Site and Off-Site) ³	B-1 through B-6
New (Proposed) Hazardous Waste Management Units	The Refinery is not proposing any additional hazardous waste management units.
Existing Hazardous Waste Management Units	B-1- and B-5
Solid Waste Management Units	B-2 through B-6

¹ Some Refinery information is repeated on multiple figures; however, only the primary figure(s) that presents the specified information is included in this table.

² A key map is provided as Figure B-8. USGS contours are depicted on Figure B-9. Detailed descriptions of access point are shown on Figure B-10.

³ The Refinery does not use any injection or withdrawal wells for refinery or hazardous waste management operations. Nearby drinking water wells are shown in Figures B-1 through B-6.

Table B-3. Wells Within 1000 Feet of the Refinery's Property Boundary

API Number	Boring	Type	X Coordinate ¹	Y Coordinate ¹
121970184300	No	Water Well	3393926	3134183
121973215500	No	Water Well	3394585	3134212
121970025300	No	Water Well	3391604	3134887
121972460500	No	Water Well	3395216	3134909
121970352400	No	Water Well	3393880	3135521
121973632200	No	Water Well	3395189	3135577
121973215300	No	Water Well	3395358	3135788
121973215100	No	Water Well	3395421	3136090
121973678500	No	Water Well	3391898	3136108
121970231500	No	Water Well	3393204	3136163
121973658200	No	Water Well	3394509	3136218
121972932900	No	Water Well	3395162	3136245
121973215400	No	Water Well	3395162	3136245
121970401100	No	Water Well	3395162	3136245
121973215200	No	Water Well	3395186	3136331
121972730400	No	Water Well	3395744	3136938
121972479800	No	Water Well	3397692	3137031
121970321900	No	Water Well	3398341	3137062
121973246600	No	Water Well	3399492	3137084
121973553400	No	Water Well	3398991	3137093
121972968600	No	Water Well	3399640	3137124
121973246200	No	Water Well	3398713	3137197
121972929400	No	Water Well	3399810	3137275
121973120900	No	Water Well	3399457	3137353
121970325800	No	Water Well	3398653	3137410
121972479900	No	Water Well	3398315	3137726
121973246300	No	Water Well	3398494	3137737
121973553100	No	Water Well	3398965	3137757
121972947200	No	Water Well	3398965	3137757
121972770600	No	Water Well	3398965	3137757
121972947300	No	Water Well	3398965	3137757
121972754500	No	Water Well	3398965	3137757
121970243700	No	Water Well	3399615	3137789
121973435600	No	Water Well	3400265	3137820
121973246500	No	Water Well	3398790	3137826
121973012100	No	Water Well	3399277	3138105
121972878400	No	Water Well	3399277	3138105
121970228400	No	Water Well	3399277	3138105
121970153200	No	Water Well	3393364	3138210
121973553200	No	Water Well	3395685	3138264
121970159400	No	Water Well	3393153	3138395
121970159500	No	Water Well	3393403	3138406

**Table B-3. Wells Within 1000 Feet of the Refinery's Property Boundary
(cont)**

API Number	Boring	Type	X Coordinate ¹	Y Coordinate ¹
121972552500	No	Water Well	3392686	3139121
121970148800	Yes	Engineering Boring	3397924	3140415
121970148600	Yes	Engineering Boring	3399105	3140465
121970148700	Yes	Engineering Boring	3397897	3141126
121970072100	Yes	Engineering Boring	3399078	3141185
121972540100	No	Not Shown	3394694	3141567
121970055700	No	Water Well	3396422	3141856
121972540200	No	Not Shown	3394628	3142067
121970177800	No	Water Well	3396420	3142156
121972540300	No	Not Shown	3395306	3142205
121973575100	No	Water Well	3396139	3142929
121970130200	No	Water Well	3395802	3143320
121973133000	No	Water Well	3396113	3143586
121970149400	No	Water Well	3398482	3143859
121970032900	No	Water Well	3397120	3144216
121970033000	No	Water Well	3397368	3144281
121972924000	No	Mineral Boring	3399375	3144421
121973633600	No	Water Well	3396061	3144899
121973054300	No	Water Well	3398036	3145009

Source: *Wells and Borings in Illinois by County*, Illinois State Geological Survey, GIS Database, 1st Edition, 1995.

¹ In Lambert feet.

API = American Petroleum Institute

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION B**

**Remove Figures Table of Contents
and replace with attached Figures Table of Contents.**

FIGURES FOR FACILITY DESCRIPTION

Figures

B-1	Facility + 1 Mile
B-2	Facility + 1000 feet (1 of 5)
B-3	Facility + 1000 feet (2 of 5)
B-4	Facility + 1000 feet (3 of 5)
B-5	Facility + 1000 feet (4 of 5)
B-6	Facility + 1000 feet (5 of 5)
B-7	FEMA FIRM Map for Will County, Illinois
B-8	Key Map
B-9	USGS Topographic Contours
B-10	Detailed Access Point Descriptions

Pages to be replaced
are not available —
CMR/6/76/09

**RENEWAL PART B PERMIT APPLICATION
VOLUME 1, SECTION B**

**Remove Figures B-1 through B-7
and replace with attached Figures B-1 through B-10.**

